EXHIBIT A

Case 3:23-cv-30016- Manple see Thierview Sheet 25

Page 2 of 189

Today's Date: 12/30/2020 Time: 1:00 PM
Name: TVAN Laguna Employer: Tcc
Home Address: 78 Lincoln 8+
City: N. Springfild State: MA Zip: 01089 Phone: 413-222-3341 (4) (p
Trade: Position:Lobore(
Years Experience: 26/4 How long have you been with this company: 21/2 weeks
Union? Yes No If yes, what union: Local#: Have you ever had any safety training? Yes No If yes, what kind: From whom? When? Who conducts the meeting? Union? Yes No If yes, what kind: Who you ever have safety meetings? Yes No If yes, how often? Who conducts the meeting? What were you working on today? Bending Materials Alocal States and the work? States 280 pm Who directed you to do that work? States 280 pm
How long have you been working on that task? Since 230 pm Who directed you to do that work? Efrain
NOTES:
See attached note pages
I understand that to the extent permissible by law, my identity as the provider of this statement will be held in confidence. If I am called to testify in a court proceeding, my identity as the statement giver will be disclosed in accordance with applicable court rules. The content of this statement and my identity may be disclosed to other federal law enforcement agencies in accordance with Department of Labor rules and procedures. This statement may be subject to disclosure in accordance with applicable statute(s) and agency policy. I have read and had the opportunity to correct this statement and these facts are true and correct to the best of my knowledge and halief. Public Law 01 500 Page 14 17(4)
knowledge and belief. Public Law 91-596, Paragraph 17(g) makes it a criminal offense to knowingly make a false statement of misrepresentation in this statement.
Signature Brett S Fortin Taken By Signature by Proxy clue to injuries,

BE NOT able to Use pen,

I have usual the machine-before to make 2-300 pieces of ongle.
ong/L.
I don't remember who told me how to use The machine. But I do remember it took less than a minute they said put piece into machine at this line and not the
button. I have been told to keep hands clear at machine but clied not need to be Common sense.
The machine has jambed before. I coulted one of the guys to help. He came out with a long metal bar and said it gets stuck sometimes that is how you fix H. I den't know if management know the machine sticks.
The foot pedal in the pleter is not the same pedal on machine day of accident. Also the grey boxe on the machine (laser eyes) they were green, smaller and I was talk client work.
I don't know anything about lock out tag out. I
Day of accident 7 was scraping paint off rehab dampsters by paint booth. Cifter linely, appox, 280 pm told to make more angle prices.
I noticed a piece at flet stack on floor by Muchine base, I stepped en II. It stid and I stipped. I reached out toward the Machine to catch myself. Both hands were an lower die plate. The stack moved towards foot pedal and hit the bottom. I didn't
on law die plate. The stock moved towards foot pedal and hit the button. I didn't know Machine was Comine down. It pinche
Know Machine uses Comine down. It pinete my finger and get Stuck. I screamed for a few minutes and Placeo Came and hit a botton on machine. To let me go.

- I was taken to the hospital.	Pg. 201
- Other employees told me via text that people were working on machine next clay. Cleaning, changing parts, more bonches. I was never told who was doing this just people.	<u></u>
- Supervisor doesn't walk the floor the whole time they have work assign	<u> </u>

OSHA

From:

Joseph Searles < jsearles@internationalcontainerco.com>

Sent:

Friday, March 12, 2021 12:31 PM

To: Cc:

OSHA Area Office Springfield

(b) (7)(C) - osha

Subject:

Abatement & photos

Attachments:

Abatement1496123.pdf; Photo1PB.jpg; Photo2PB.jpg; Photo3PB.jpg; Photo4PB.jpg; Photo5PB.jpg; Photo6PB.jpg; Photo7PB.jpg; Photo8PB.jpg; Photo9PB.jpg; Photo10PB.jpg

Filed 11/26/25

CAUTION - The sender of this message is external to the DOL network. Please use care when clicking on links and responding with sensitive information. Send suspicious email to spam@dol.gov.

Hi

Attached is our abatement report along with accompanying documents that I believe support our discussion. I wrote in on the abatement for Citation 1 Item 2 that we had our LOTO approved in the State walk-through. We are happy to add to this whatever is necessary, but we just need specific info on what that it. I have also attached the letter from (D)(I)(C) stating that we completed the abatements. Also attached is the page from the machine manual that states that the brake will not run without the light curtain being operational.

In regard to the brake, we had a tech from the manufacturer come into our facility late 2019. He inspected our brake which was having operational problems. He told us that we need to replace the "brain" of the machine. He identified that part and told us what to order. We had 2 options, a knockoff of the factory part, or the original OEM part from the manufacturer. The OEM part was 12K as opposed to 5K for the knockoff. We purchased the OEM part because the manufacturer had told us that this is a machine specific part and had to be programmed by the manufacturer. It had to be shipped from Australia to Turkey. Then it was preprogrammed in Turkey, sent to Florida and then was shipped to us. Our credit card info was stolen during this whole process as well. Then we called to have them install it and they told us they could not send a tech for a while but that they could talk us through how to put it in. We put it in and because the brake was working, we figured every aspect of the machine was working. As it states in the manual that if the light curtain is not operational then the machine will not be operational. I tell you this to illustrate that we did not take any shortcuts when it came to this machine.

Thank you, Joseph Searles International Container Co., LLC (413) 538 - 9200

U.S. Department of Labor Occupational Safety and Health Administration 1441 Main Street Room 550 Springfield, MA 01103



02/04/2021

International Container Co. LLC and its successors 110 N Bridge St Holyoke, MA 01040

Dear Employer:

Enclosed you will find citations for violations of the Occupational Safety and Health Act of 1970 (the Act) which may have accompanying proposed penalties. Also enclosed is a booklet entitled, "Employer Rights and Responsibilities Following an OSHA Inspection", (OSHA 3000-04R) revised 2018, which explains your rights and responsibilities under the Act. If you have any questions about the enclosed citations and penalties, I would welcome further discussions in person or by telephone. Please contact me at (413) 785-0123.

You will note on page 6 of the booklet that, for violations which you do not contest, you must (1) notify this office promptly by letter that you have taken appropriate corrective action within the time set forth on the citation; and (2) pay any penalties assessed. Please inform me of the abatement steps you have taken and of their dates together with adequate supporting documentation; e.g., drawings or photographs of corrected conditions, purchase/work orders related to abatement actions, air sampling results. This information will allow us to close the case.

As indicated on page 3 of the booklet, you may request an informal conference with me during the 15-workingday notice of contest period. During such an informal conference you may present any evidence or views which you believe would support an adjustment to the citation or the penalty.

If you are considering a request for an informal conference to discuss any issues related to this Citation and Notification of Penalty, you must take care to schedule it early enough to allow time to contest after the informal conference, should you decide to do so. Please keep in mind that a written letter of intent to contest must be submitted to the Area Director within 15 working days of your receipt of the citation. The running of this contest period is not interrupted by an informal conference.

If you decide to request an informal conference, please complete the attached notice at the bottom of this letter and post it next to the Citations as soon as the time, date and the place of the informal conference have been determined. Be sure to bring to the conference with you any and all supporting documentation of existing conditions as well as of any abatement steps taken thus far. If conditions warrant, we can enter into an informal settlement agreement which amicably resolves this matter without litigation or contest.

You should be aware that OSHA publishes information on its inspection and citation activity on the Internet under the provisions of Electronic Freedom of Information Act. The information related to these alleged violations will be posted when our system indicates that you have received this citation. You are encouraged to review the information concerning your establishment at www.osha.gov. If you have any dispute with the accuracy of the information displayed, please contact this office.

Sincerely,

Mary E. Hoye Date: 2021.02.04 12:19:57

Mary E Hoye Area Director

Enclosures

Occupational Safety and Health Administration 1441 Main Street Room 550 Springfield, MA 01103



Citation and Notification of Penalty

To: International Container Co. LLC / and its successors 110 N Bridge St, Holyoke, MA 01040

Inspection Site: 110 N Bridge St, Holyoke, MA 01040 **Inspection Number: 1496123**

Inspection Date(s): 10/07/2020-01/20/2021

Issuance Date: 02/04/2021

The violation(s) described in this Citation and Notification of Penalty is (are) alleged to have occurred on or about the day(s) the inspection was made unless otherwise indicated within the description given below

This Citation and Notification of Penalty (this Citation) describes violations of the Occupational Safety and Health Act of 1970. The penalty(ies) listed herein is (are) based on these violations. You must abate the violations referred to in this Citation by the dates listed and pay the penalties proposed, unless within 15 working days (excluding weekends and Federal holidays) from your receipt of this Citation and Notification of Penalty you either call to schedule an informal conference (see paragraph below) or you mail a notice of contest to the U.S. Department of Labor Area Office at the address shown above. Please refer to the enclosed booklet (OSHA 3000) which outlines your rights and responsibilities and which should be read in conjunction with this form. Issuance of this Citation does not constitute a finding that a violation of the Act has occurred unless there is a failure to contest as provided for in the Act or, if contested, unless this Citation is affirmed by the Review Commission or a court.

Posting - The law requires that a copy of this Citation and Notification of Penalty be posted immediately in a prominent place at or near the location of the violation(s) cited herein, or, if it is not practicable because of the nature of the employer's operations, where it will be readily observable by all affected employees. This Citation must remain posted until the violation(s) cited herein has (have) been abated, or for 3 working days (excluding weekends and Federal holidays), whichever is longer.

Informal Conference - An informal conference is not required. However, if you wish to have such a conference you may request one with the Area Director during the 15 working day contest period by calling (413) 785-0123. During such an informal conference, you may present any evidence or views which you believe would support an adjustment to the citation(s) and/or penalty(ies).

If you are considering a request for an informal conference to discuss any issues related to this Citation and Notification of Penalty, you must take care to schedule it early enough to allow time to contest after the informal conference, should you decide to do so. Please keep in mind that a written letter of intent to contest must be submitted to the Area Director within 15 working days of your receipt of this Citation. The running of this contest period is not interrupted by an informal conference.

If you decide to request an informal conference, please complete, remove and post the Notice to Employees next to this Citation and Notification of Penalty as soon as the time, date, and place of the informal conference have been determined. Be sure to bring to the conference any and all supporting documentation of existing conditions as well as any abatement steps taken thus far. If conditions warrant, we can enter into an informal settlement agreement which amicably resolves this matter without litigation or contest.

Right to Contest — You have the right to contest this Citation and Notification of Penalty. You may contest all citation items or only individual items. You may also contest proposed penalties and/or abatement dates without contesting the underlying violations. <u>Unless you inform the Area Director in writing that you intend to contest the citation(s) and/or proposed penalty(ies) within 15 working days after receipt, the citation(s) and the proposed penalty(ies) will become a final order of the Occupational Safety and Health Review Commission and may not be reviewed by any court or agency.</u>

Penalty Payment – Penalties are due within 15 working days of receipt of this notification unless contested. (See the enclosed booklet and the additional information provided related to the Debt Collection Act of 1982.) Make your check or money order payable to "DOL-OSHA". Please indicate the Inspection Number on the remittance. You can also make your payment electronically at www.pay.gov. At the top of the pay.gov homepage, type "OSHA" in the Search field and select Search. From OSHA Penalty Payment Form search result, select Continue. The direct link is:

https://www.pay.gov/paygov/forms/formInstance.html?agencyFormId=53090334

You will be required to enter your inspection number when making the payment. Payments can be made by credit card or Automated Clearing House (ACH) using your banking information. Payments of \$25,000 or more require a Transaction ID, and also must be paid using ACH. If you require a Transaction ID, please contact the OSHA Debt Collection Team at (202) 693-2170.

OSHA does not agree to any restrictions or conditions or endorsements put on any check, money order, or electronic payment for less than the full amount due, and will process the payments as if these restrictions or conditions do not exist.

Notification of Corrective Action – For each violation which you do not contest, you must provide abatement certification to the Area Director of the OSHA office issuing the citation and identified above. This abatement certification is to be provided by letter within 10 calendar days after each abatement date. Abatement certification includes the date and method of abatement. If the citation indicates that the violation was corrected during the inspection, no abatement certification is required for that item. The abatement certification letter must be posted at the location where the violation appeared and the corrective action took place or employees must otherwise be effectively informed about abatement activities. A sample abatement certification letter is enclosed with this Citation. In addition, where the citation indicates that **abatement documentation** is necessary, evidence of the purchase or repair of equipment, photographs or video, receipts, training records, etc., verifying that abatement has occurred is required to be provided to the Area Director.

Employer Discrimination Unlawful - The law prohibits discrimination by an employer against an

employee for filing a complaint or for exercising any rights under this Act. An employee who believes that he/she has been discriminated against may file a complaint no later than 30 days after the discrimination occurred with the U.S. Department of Labor Area Office at the address shown above.

Employer Rights and Responsibilities – The enclosed booklet (OSHA 3000) outlines additional employer rights and responsibilities and should be read in conjunction with this notification.

Notice to Employees – The law gives an employee or his/her representative the opportunity to object to any abatement date set for a violation if he/she believes the date to be unreasonable. The contest must be mailed to the U.S. Department of Labor Area Office at the address shown above and postmarked within 15 working days (excluding weekends and Federal holidays) of the receipt by the employer of this Citation and Notification of Penalty.

Inspection Activity Data – You should be aware that OSHA publishes information on its inspection and citation activity on the Internet under the provisions of the Electronic Freedom of Information Act. The information related to these alleged violations will be posted when our system indicates that you have received this citation. You are encouraged to review the information concerning your establishment at www.osha.gov. If you have any dispute with the accuracy of the information displayed, please contact this office.

U.S. Department of Labor Occupational Safety and Health Administration



NOTICE TO EMPLOYEES OF INFORMAL CONFERENCE

informal conference.	
. Employees and/or representatives of employees have a	right to attend an
Main Street Room 550 Springfield, MA 01103 on at	
02/04/2021. The conference will be held by telephone or at the OSHA office lo	ocated at 1441
An informal conference has been scheduled with OSHA to discuss the citation	(s) issued on

CERTIFICATION OF CORRECTIVE ACTION WORKSHEET

Company Name: International Container Co. LLC / Inspection Site: 110 N Bridge St, Holyoke, MA 01040

Issuance Date: 02/04/2021

List the specific method of correction for each item on this citation in this package that does not read "Corrected During Inspection" and return to: U.S. Department of Labor – Occupational Safety and Health Administration, 1441 Main Street Room 550 Springfield, MA 01103.

Citation Number By (Method of Abate	ement):	was corrected on	
By (Method of Abate	and Item Number ement):	was corrected on	
Citation Number By (Method of Abate	and Item Number ement):	was corrected on	_
Citation Number	and Item Number	was corrected on	
Citation Number By (Method of Abate	mem):	was corrected on	
Citation Number By (Method of Abate	and Item Number	was corrected on	
I certify that the information in the information of the certific that the information is a second control of the certific that the information is a second control of the certific that the information is a second control of the certific that the information is a second control of the certific that the information is a second control of the certific that the information is a second control of the certific that the information is a second control of the certific that the information is a second control of the certific that the information is a second control of the certific that the information is a second control of the certific that t	rmation contained in this been informed of the aba	document is accurate and that the affected employees and the tement.	eir
Signature		Date	
Typed or Printed Name		Title	

NOTE: 29 USC 666(g) whoever knowingly makes any false statements, representation or certification in any application, record, plan or other documents filed or required to be maintained pursuant to the Act shall, upon conviction, be punished by a fine of not more than \$10,000 or by imprisonment of not more than 6 months or both.

POSTING: A copy of completed Corrective Action Worksheet should be posted for employee review

Inspection Number: 1496123

Occupational Safety and Health Administration Inspection Date(s): 10/07/2020 - 01/20/2021

Inspection Number: 1496123

Issuance Date: 02/04/2021



Citation and Notification of Penalty

Company Name: International Container Co. LLC Inspection Site: 110 N Bridge St Holyoke, MA 01040

Type of Violation: Serious Citation 1 Item 1

29 CFR 1910.145(c)(2)(i): Caution signs were not used to warn against potential hazards or to caution against unsafe practices:

110 N Bridge St. Holyoke, MA. On or about September 29, 2020 the employer had not ensured that caution signs meeting American National Standard Z53.1-1967 were affixed to areas of a hydraulic brake that posed specific safety and health hazards to operators and other exposed employees. The caution signs affixed to the front of the brake were worn and not legible and the employer had not removed the defective safety signs and replaced them with signs that were legible to employees using the machine.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM.

Date By Which Violation Must be Abated:

March 03, 2021

\$6,827.00

Proposed Penalty:

Occupational Safety and Health Administration Inspection Date(s): 10/07/2020 - 01/20/2021

Inspection Number: 1496123

Issuance Date: 02/04/2021



Citation and Notification of Penalty

Company Name: International Container Co. LLC Inspection Site: 110 N Bridge St Holyoke, MA 01040

Type of Violation: Serious Citation 1 Item 2

29 CFR 1910.147(c)(1): The employer did not establish a program consisting of an energy control procedure, employee training and periodic inspections to ensure that before any employee performed any servicing or maintenance on a machine or equipment where the unexpected energizing, startup or release of stored energy could occur and cause injury, the machine or equipment shall be isolated from the energy source and rendered inoperative:

110 N Bridge St. Holyoke, MA. On or about September 29, 2020 the employer had not established an energy control procedure which included the following program requirements. The procedures did not include a purpose of the procedure statement, statements addressing the specific sources of energy with each piece of equipment, statements relating to the specific location of areas to lock to isolate power and the establishment of periodic inspections for the procedure as required by 1910.147 Appendix A (non-voluntary).

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

March 03, 2021

Proposed Penalty:

\$7,510.00

Occupational Safety and Health Administration Inspection Date(s): 10/07/2020 - 01/20/2021

Inspection Number: 1496123

Issuance Date: 02/04/2021



Citation and Notification of Penalty

Company Name: International Container Co. LLC Inspection Site: 110 N Bridge St Holyoke, MA 01040

Type of Violation: Serious Citation 1 Item 3

29 CFR 1910.212(a)(1): One or more methods of machine guarding was not provided to protect the operator and other employees in the machine area from hazards such as those created by point of operation, ingoing nip points, rotating parts, flying chips and sparks:

110 N Bridge St. Holyoke, MA. On or about September 29, 2020 the employer had not provided one or more methods of guarding to prevent employees from getting any part of their body into the point of operation of an Ermak SPA 12 automatic brake machine exposing employees to amputations.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

March 03, 2021 \$10,513.00

Proposed Penalty:

Mary E. Hoye Date: 2021.02.04 12:20:31 -05:00

Mary E Hoye Area Director

U.S. Department of Labor
Occupational Safety and Health Administration
1441 Main Street
Room 550
Springfield, MA 01103



INVOICE / DEBT COLLECTION NOTICE

Company Name: International Container Co. LLC / Inspection Site: 110 N Bridge St, , Holyoke, MA 01040

Issuance Date: 02/04/2021

Summary of Penalties for Inspection Number: 1496123

 Citation 1 Item 1, Serious
 \$6,827.00

 Citation 1 Item 2, Serious
 \$7,510.00

 Citation 1 Item 3, Serious
 \$10,513.00

TOTAL PROPOSED PENALTIES:

\$24,850.00

To avoid additional charges, please remit payment promptly to this Area Office for the total amount of the uncontested penalties summarized above. Make your check or money order payable to: "DOL-OSHA". Please indicate OSHA's Inspection Number (indicated above) on the remittance. You can also make your payment electronically at www.pay.gov. At the top of the pay.gov homepage, type "OSHA" in the Search field and select Search. From the OSHA Penalty Payment Form search result, select Continue. The direct link is: https://www.pay.gov/paygov/forms/formInstance.html?agencyFormId=53090334. You will be required to enter your inspection number when making the payment. Payments can be made by credit card or Automated Clearing House (ACH) using your banking information. Payments of \$25,000 or more require a Transaction ID, and also must be paid using ACH. If you require a Transaction ID, please contact the OSHA Debt Collection Team at (202) 693-2170.

OSHA does not agree to any restrictions or conditions or endorsements put on any check, money order, or electronic payment for less than the full amount due, and will cash the check or money order as if these restrictions or conditions do not exist.

If a personal check is issued, it will be converted into an electronic fund transfer (EFT). This means that our bank will copy your check and use the account information on it to electronically debit your account for the amount of the check. The debit from your account will then usually occur within 24 hours and will be shown on your regular account statement. You will not receive your original check back. The bank will destroy your original check, but will keep a copy of it. If the EFT cannot be completed because of insufficient funds or closed account, the bank will attempt to make the transfer up to two times.

Pursuant to the Debt Collection Act of 1982 (Public Law 97-365) and regulations of the U.S. Department of Labor (29 CFR Part 20), the Occupational Safety and Health Administration is required to assess interest, delinquent charges, and administrative costs for the collection of delinquent penalty debts for violations of the Occupational Safety and Health Act.

Interest: Interest charges will be assessed at an annual rate determined by the Secretary of the Treasury on all penalty debt amounts not paid within one month (30 calendar days) of the date on which the debt amount becomes due and payable (penalty due date). The current interest rate is one percent (1%). Interest will accrue from the date on which the penalty amounts (as proposed or adjusted) become a final order of the Occupational Safety and Health Review Commission (that is, 15 working days from your receipt of the Citation and Notification of Penalty), unless you file a notice of contest. Interest charges will be waived if the full amount owed is paid within 30 calendar days of the final order.

<u>Delinquent Charges</u>: A debt is considered delinquent if it has not been paid within one month (30 calendar days) of the penalty due date or if a satisfactory payment arrangement has not been made. If the debt remains delinquent for more than 90 calendar days, a delinquent charge of six percent (6%) per annum will be assessed accruing from the date that the debt became delinquent.

Administrative Costs: Agencies of the Department of Labor are required to assess additional charges for the recovery of delinquent debts. These additional charges are administrative costs incurred by the Agency in its attempt to collect an unpaid debt. Administrative costs will be assessed for demand letters sent in an attempt to collect the unpaid debt.

Mary E. Hoye Digitally signed by Mary E. Hoye Date: 2021.02.04 12:20:48 -05'00'	02/02/2021
Mary E Hoye	Date
Area Director	

EXHIBIT B

UNITED STATES DISTRICT COURT

DISTRICT OF MASSACHUSETTS

NO. 3:23-CV-30016

Ivan Laguna and Margarita Lopez,

Plaintiffs,

v.

Lazer Safe, Pty, Ltd, Fiessler

Elektronik GmbH & Co., KG., Ermak

USA, Inc., Ermaksan Turkey, aka

Ermaksan Makina Sanayi Ve Ticaret

A.S., and John Doe Distributor, VOLUME 1

Defendants.

PAGES 1-62

AUDIOVISUAL DEPOSITION TAKEN VIA ZOOM OF

MEHMET TATLI

Wednesday, April 9, 2025 at 8:32 a.m.

Reporter: Lori-Ann London, RPR, Mass. CSR #153020

LONDON STENOGRAPHY LLC
P.O. Box 155
Manomet, MA 02345
774.259.0646
londonreporter@comcast.net

```
REMOTE APPEARANCES OF COUNSEL
 1
 2
     (All parties present from their respective
 3
     locations via Zoom videoconferencing)
 4
 5
     On Behalf of the Plaintiff:
 6
         SULLIVAN & SULLIVAN, LLP
 7
         83 Walnut Street
 8
         Wellesley, Massachusetts 02481
 9
         781.263.9400
10
         By: MICHAEL J. MASCIS, ESQUIRE
11
              mmascis@sullivanllp.com
12
13
     On Behalf of Defendant Lazer Safe Pty. Ltd.:
14
15
         LITCHFIELD CAVO
16
         Suite 1006 Kimball Lane
         Lynnfield, Massachusetts 01940
17
         781.309.1500
18
         By: NORA ADUKONIS, ESQUIRE
19
20
              adukonis@litchfieldcavo.com
21
22
23
     (Continued)
24
```

Page 3

```
REMOTE APPEARANCES OF COUNSEL (Continued)
 1
 2
     On Behalf of Defendants Fiessler Elektronik GmbH:
 3
         REED SMITH
 4
         225 Fifth Avenue, Suite 1200
 5
         Pittsburgh, Pennsylvania 15222
 6
         412.288.7242
 7
         By: PATRICIA ANTEZANA, ESQUIRE
 8
 9
              pantezana@reedsmith.com
10
11
     On Behalf of Defendants Ermak USA, Inc. and
12
     Ermaksan Turkey:
         ATOM LAW GROUP
13
         770 N LaSalle Street, Suite 700
14
         Chicago, Illinois 60654
15
16
         312.943.8000
17
         By: SEAN M. SHARP, ESQUIRE
              ssharp@atom.law
18
19
20
     ALSO PRESENT:
21
         David Woodford, Legal Video Specialist
22
23
24
```

```
Α
               Okay.
 1
 2
          Q
               Okay. Where are you testifying from
     today?
 3
               From Turkey.
 4
          Α
               Okay. And is that your -- is that where
 5
          Q
     you are employed?
 6
          Α
               Yes, I'm working here.
 7
          0
               Okay. And what is your -- what is your
 8
     position at Lazer Safe?
9
               Customer -- customer service, supporting
10
     the customers, remotely.
11
12
          0
               Okay. Does your job involve travel at
     all to the United States?
13
          Α
               Yes. Not -- no, not the -- not United
14
              I never been in the US.
15
16
              As far as your -- the description of your
     position, what is the title you have at Lazer Safe?
17
          Α
               Customer service engineer.
18
               Can you describe your educational
19
     background for us?
20
               Yeah. I'm educated in the university for
21
          Α
     electrical and electronics engineering.
22
               And where did you get your engineering
23
          O
24
     degree?
```

```
MB degree.
          Α
 1
 2
               I'm sorry, what was that?
               From -- are you asking the university
 3
          Α
     name or only the degree?
 4
               The university's name where you -- where
 5
     you attended.
 6
          Α
               It's Cukurova University at the south of
 7
     Turkey in Adana, city Adana.
 8
               And -- and have you had -- do you have a
          0
9
     license or certification as a engineer?
10
          Α
               Yes.
11
12
          Q
               How long have you held that?
               I don't have it now.
13
          Α
               Okay. How long have you worked for Lazer
          Q
14
     Safe?
15
16
          Α
               Officially I am contracted with Lazer
     Safe since 2008.
17
               2008? Okay.
18
          Q
19
          Α
               Yes.
               Do your job duties include training --
20
     training customers on how to operate Lazer Safe
21
     products?
22
23
          Α
               Yes.
24
          0
               And how do you -- how do you perform the
```

training? 1 2 Α When I was at the customer's for installation, integration, and then training, after 3 we get the machine running, then we demonstrate all 4 the modes and how Lazer Safe works on the machine. 5 So it's -- it's on-site. 6 7 Do you -- do you do -- the training that you do, is it all on-site or is some of it remote? 8 Α Yeah, some of them are remote. As, for 9 example, during the pandemic, it was all remotely. 10 For today's deposition, have you reviewed 11 12 any documents at all? Α Yes. 13 Could you just describe them for us? Q 14 I know there's an accident, and there are 15 16 some correspondence internally at Ermaksan and there are some emails between myself and Ermak USA 17 and myself and Ermak Turkey, the purchasing guys. 18 THE STENOGRAPHER: What was that? 19 Purchasing guys from Ermak. 20 Α THE STENOGRAPHER: I still didn't 21 understand. 22 I'm sorry. Α The buyers at Ermak, or maybe it's spare 23 parts responsible. Spare part responsibles at 24

```
They ask me about a fault on the PCSS,
 1
     which is our safety PSE, and then I told them if
 2
     they get that code on the PCSS, I told them the
 3
     PCSS is faulty and must be replaced --
 4
               And the --
 5
          Q
               -- with a new one.
          Α
 6
 7
               The PCSS that you're talking about that
     was the subject of your conversation with Ermaksan,
 8
     could you describe what that is for us laypeople?
 9
     What is the PCSS?
10
               A press -- press control and safety
11
          Α
12
     system.
              This is the safety controller of the
     machine.
13
               And that is like a computer?
          Q
14
               No, not like a computer.
15
16
          Q
               Okay. Does it run off of software?
17
          Α
               Yes.
               Could you explain that? How does the
18
          Q
     controller run off of software?
19
                   MS. ADUKONIS: Objection.
20
21
                   You can answer.
               You can -- you can program the PCSS
22
          Α
23
     according to the machine wiring and depending on
24
     the configuration of the customer.
```

```
And the -- the emails that were -- that
          Q
 1
 2
     you had with Ermaksan, were they -- that you
     described, were they -- you recall them being --
 3
     occurring in October of 2019?
 4
                   MS. ADUKONIS: Objection.
 5
               2019?
          Α
 6
 7
                   MS. ADUKONIS: You can answer.
          Α
               2019? I'm not sure. It was -- as far as
 8
     I remember, it was early in October.
9
               Okay. Were -- do you recall where --
10
     where you were working -- you know, where were you
11
     based for Lazer Safe in October of 2019?
12
               I don't remember, but most probably in
          Α
13
     Turkey. Because if I am traveling, I'm not
14
     responding to the emails mostly.
15
16
               Okay. And are you familiar with the
17
     Ermaksan press brake machine that was the subject
     of the emails between you and Ermaksan?
18
19
                   MS. ADUKONIS: Objection.
                   You can answer.
20
               We -- you know, Ermaksan is also in
21
              So we set up and integrated the machines
22
     Turkey.
     together, but not all of the machines, only if for
23
     a model of the machine we integrate the system, and
24
```

```
then they do everything else, because they are the
 1
 2
     OEM, they are the manufacturer.
               So the -- I'm sorry.
 3
               So I -- yeah, this machine was made
 4
     together. Because we made only one machine or two
 5
     machines, then they do hundreds.
 6
               Does -- do you, in your duties for Lazer
 7
     Safe, install the close proximity guards
 8
     manufactured by Lazer Safe?
9
               At the manufacturers?
10
11
          Q
               Yeah.
12
          Α
               Yeah, only for -- for integration
     purpose.
13
          Q
               But --
14
               Not on all --
15
          Α
16
          Q
               Let me just show --
               Not on -- not on all of the machines they
17
          Α
     -- they manufacture, only one of them or maybe two
18
     of them, and then after that training, and then
19
     they do the job by themselves.
20
               I'm gonna just show you a photograph and
21
     it's been marked -- I've marked them all
22
     previously, but let me pull it up here. Give me
23
24
     just a minute here.
```

```
Okay. Okay. So this -- this exhibit
 1
     is marked as Exhibit 6.
 2
                   (Exhibit 6 marked for
 3
                   identification.)
 4
                   MR. MASCIS: Please bear with me
 5
     while I pull it up.
 6
 7
                   (Screen sharing.)
          Q
               Okay. Do you recognize what's shown in
 8
     this photo?
9
               Yes, this is an Ermak machine with Lazer
10
     Safe.
11
12
          Q
               Yeah. And in this photo can we see the
13
     Lazer Safe proximity guard components?
          Α
               Yes, the transmitter and receiver --
14
               Would that be --
15
          0
16
          Α
               -- but they are not in line.
               Okay. So where my cursor is located here
17
          Q
     on the right side, that's one of the --
18
          Α
               Yeah, this is --
19
                   THE STENOGRAPHER: Wait. Wait.
20
     Wait. Mr. Tatli, you have to wait for the whole
21
     question. I can't take both of you speaking at the
22
     same time.
23
24
                   THE WITNESS: Okay.
```

```
Okay. So when he -- when he sent you
          Q
 1
 2
     this email, do you recall what -- what you did in
     response to receiving the email?
 3
               Can you repeat the question? After this
          Α
 4
     email...
 5
               Yeah. After you received this email,
          0
 6
 7
     what -- what did you do?
          Α
               I answered the email to tell them the
 8
     PCSS is faulty in this case.
9
               Okay. So did you have to access any --
10
     any -- any materials or manuals or anything -- any
11
12
     information before you responded to this email?
               Yeah, to check the code.
13
          Α
          Q
               Okay.
14
                      You need to check the code, what
15
16
     the code meaning and then respond -- respond to the
     customer. So this code means the PCSS has internal
17
     fault and it needs to be replaced with a new one.
18
               Okay. And this email that was sent to
19
          0
     you from Mr. Evci on that date, on October -- let
20
     me just pull back to page 37 -- on October 4th,
21
     he's also included some emails that -- in the body
22
     of his email, and you review -- did you review
23
     those emails as well? If we go to page 30.
24
```

```
So the other -- the other correspondence
          Α
 1
 2
     with the customer, do you mean?
               Yeah. So let's go to page 39, I think
 3
          Q
     which is the start, this is the included, an email
 4
     on page 39 from Mr. Menard at International
 5
     Container Company --
 6
          Α
 7
               Yes.
          0
               -- to Hulya Yilmaz at Ermaksan -- Ermak
 8
     USA.
9
          Α
               Yeah.
10
               So -- and this is -- this -- this piece
11
     of the -- of the email has some references. Did
12
     you take note of those references?
13
                   MS. ADUKONIS: Objection.
14
               No. No, I don't interested in this.
15
16
               Okay. Did -- did -- did this email help
     you understand what the code error request was from
17
     Mr. Evci?
18
19
               Mr. Evci was report of the code anyway,
     it was in -- in his email.
20
21
          Q
               Yeah.
               So I don't need to go through the other
22
          Α
     correspondence, it's all between Ermak USA and the
23
24
     customer.
```

```
Okay. So was it your practice to go and
          Q
 1
 2
     look at the chain of emails to under -- to get a
     better understanding of what -- what was -- what
 3
     had occurred?
 4
               If I understand from his email, I don't
 5
          Α
     need to.
 6
               Okay. All right. So did you ever --
 7
     have you ever spoken with this Mr. Menard at the
 8
     International Container Company --
9
          Α
               No.
10
               -- about -- about this situation, the
11
          Q
12
     PCSS error?
13
          Α
               No.
               Okay. So on page 36 of Exhibit 3 -- let
14
          Q
     me just scroll down here -- we have your response
15
     to Mr. Evci, Monday, October 7th. Is that right?
16
               Yeah, that's -- that's right. I'm just
17
          Α
     asking him to send it to the proper email address.
18
               That was my question. So in order to --
19
     to get a ticket, you had to have him send you a
20
21
     request to a specific email?
               That's right, customerservice@
22
          Α
     lazersafe.com.
23
24
          0
               Okay.
```

When you send an email to this email Α 1 2 address, then a ticket created. And then at that point does customer 3 Q service send you the ticket, or can you access it 4 5 yourself? No, our ticket system is -- automatically 6 create the ticket and send it to all the customer 7 service members. 8 Q Okay. And that documents this call and 9 -- and your correspondence with Mr. Evci. Is that 10 right? 11 12 Α Sorry? That's the documentation of this email 13 between yourself and Mr. Evci, the -- I'll rephrase 14 that. 15 16 The ticket for -- the ticket is the system you described earlier where Lazer Safe 17 records the customer service request, correct? 18 19 Α I didn't get the answer -- the question. Sorry. 20 21 Okay. The re -- could you just tell us, why did you -- and I don't ask you to repeat 22 yourself, but just explain to us why did you need 23 to have the email sent to customer service at Lazer 24

Safe? 1 2 Yeah, he sent the email to my personal company email address, and I asked him to send it 3 to the customerservice@lazersafe.com email address 4 so that the ticket, it can be created, and then we 5 continue from that ticket. 6 7 And so when you were doing -corresponding with Mr. Evci on this ticket, you 8 understood that the press brake machine with the 9 Lazer Safe close proximity guard was located in 10 Holyoke, Massachusetts, correct? 11 12 Α No. Q Okay. 13 In his email he only mentioned about the Α 14 machine is in America. 15 16 Q America. Okay. Not Massachusetts. I have no idea 17 Α about --18 19 Q Okay. -- about the machine location. 20 Α And then if -- and, again, did you -- did 21 you -- if you look at page 39, did you -- did --22 23 did you -- did you ever just look at page 39 to 24 understand that Mr. Menard was contacting you -- or

```
not -- strike that -- Mr. Menard was contacting
 1
     Mr. Evci about -- strike that.
 2
 3
                   So from your review of the email, can
     you describe for us what you did once you set up
 4
     the ticket for this request from Mr. Evci?
 5
               After getting the email, I saw the code
 6
 7
     reported, and then I searched for the code in -- in
     our database or --
 8
          Q
               Yeah.
9
               -- and then I just responded to him.
10
               And did he -- at some point did you
11
12
     understand that -- or you had recommended that they
13
     replace the PCSS controller?
          Α
               Yes, that was in my response.
14
15
          0
               And let's see. Go to page...
16
                   (Pause.)
               Looking at page 35 of Exhibit 3, and is
17
          Q
     this -- this is a response on -- you wrote on
18
     Monday, the 7th of October 2019 to Mr. Evci?
19
               That's right. It was in Turkish, but
20
          Α
21
     this is translated.
               Ah. And when you say that -- the first
22
          Q
     thing you say, you talk about, here on Exhibit 3,
23
     page 35, trying to update the kernel software,
24
```

```
K-E-R-N-E-L?
 1
 2
          Α
              Yeah.
               What is the kernel software?
 3
          Q
               This is the main software in the PCSS,
          Α
 4
     running on the PCSS. We had two levels of
 5
     software, the kernel version and then we have the
 6
     Isagraf software, which is the PIC program of the
 7
     PIC, to run the machine.
 8
          Q
               And so the kernel software operates the
9
     close proximity guard. Is that right?
10
               It's the certified -- certified software.
11
12
     So we -- we cannot amend or -- or modify this
13
     software.
          Q Does --
14
               This is the -- yeah, all safety options
15
16
     are in this software and this is certified
    by TUY North.
17
                   THE STENOGRAPHER: By what?
18
19
         A
               So --
                   THE STENOGRAPHER: Certified by what?
20
                   THE WITNESS: TUY North. Certified
21
    by TUY North.
22
23
                   THE STENOGRAPHER: Can you spell
24
     that?
```

```
THE WITNESS: T-U-Y. T-U-Y.
 1
               So this -- this software cannot be
 2
     modified or -- you can only load it to the PCSS.
 3
     And according to the code description, updating the
 4
     kernel version might help. That's why I suggested
 5
     to up -- up -- update the kernel first, and as you
 6
     see, and if it doesn't work, then the PCSS needs to
 7
     be repaired.
 8
          0
               Now, in order to update the kernel
9
     software, did -- does the customer have to go
10
     access some -- some computer site to download the
11
12
     updates?
13
                   MS. ADUKONIS: Objection.
                   You can answer.
14
               What do you mean?
15
          Α
16
               Well, how do you update -- how do you
     update kernel software, as you're describing?
17
          Α
                      You need a laptop, you need a
18
     cable to connect to the PCSS, and then you update
19
     the kernel.
20
               And is kernel -- is the kernel software
21
     owned by Lazer Safe?
22
23
          Α
               Yes.
                   MS. ADUKONIS: Objection. Sorry.
24
```

```
Is it -- is it -- do you know, is the
          Q
 1
 2
     kernel -- kernel software -- strike that.
                   There's also a reference...
 3
                   (Pause.)
 4
               There's also a reference to something
 5
          Q
     called "Isagraf" -- I'll spell it -- I-S-A-G-R-A-F.
 6
 7
               Yes. This is the PCSS program. This is
     the second level.
 8
          0
               Yeah.
 9
               This is the second level software which
10
     we can modify and select options. And Isagraf
11
12
     application is communicating with the kernel
     software internally.
13
               And did that -- is that Isagraf software
          Q
14
     accessible in a similar way as you described as the
15
16
     kernel software is accessible?
               Yeah. With the kernel version, it's --
17
          Α
     it's the same for all manufacturers, all the PCSS
18
     units. But the Isagraf is for manufacturers.
19
20
          Q
               Okay.
               So that the reason I'm asking for Isagraf
21
     application record is if you have a new PCSS, you
22
23
     have to load the correct Isagraf application,
     otherwise the machine would -- would not work.
24
```

Page 51

```
Okay. Showing you what we marked as
          Q
 1
     Exhibit 8 in this deposition.
 2
                    (Screen sharing.)
 3
               Can you see that photograph, Exhibit 8?
          Q
 4
          Α
               Yes.
 5
               Do you recognize what that shows?
          Q
 6
               Yes, this is a Lazer Safe part, receiver.
 7
          Α
          Q
               Okay. And then from that serial number,
 8
     would you be able to identify when that part was
9
     sold by Lazer Safe?
10
          Α
               No.
11
12
                    (Pause.)
13
          Α
               It's a very old one.
               Yeah.
14
          Q
               I just can't say.
15
16
          Q
               Yeah, let me also show you the -- the
     other photo on that. It's Exhibit 9.
17
                    (Exhibit 9 marked for
18
                    identification.)
19
                    (Screen sharing.)
20
               Can you see Exhibit 9?
21
          Q
          Α
               Yes.
22
23
               Do you recognize that -- what's shown in
          Q
24
     that photo?
```

```
Yes. This is a transmitter, a Lazer Safe
          Α
 1
 2
     part.
 3
          Q
               Okay.
               Very old one as well.
 4
          Α
               Yeah.
 5
          Q
                   And then what -- what is the -- the
 6
     serial number that we see there, is that of any use
 7
     to you in identifying when that transmitter was
 8
     sold?
 9
               Not on this one.
10
               Okay. Got one more. I've got another
11
          Q
12
     picture to show you on this, so... Okay.
                   (Exhibit 11 marked for
13
                   identification.)
14
                   (Screen sharing.)
15
16
               Okay. So this document I'm gonna -- just
     for the record, this is Exhibit 11 from the Lazer
17
     Safe 30(b)(6) deposition. And do you recognize
18
     what's shown in that document?
19
          Α
               Yes. This is PCSS F.
20
21
          Q
               Okay.
               But not on the machine, it's like someone
22
          Α
     holding it.
23
24
          0
               So --
```

```
THE STENOGRAPHER: I'm sorry?
 1
 2
               It's not connected to the machine,
     someone holding it on the table.
 3
               And is there anything -- any -- strike
          Q
 4
 5
     that.
                   Where it says in this right-hand
 6
 7
     part, it looks like it says soft -- software
     version, someone's written in K-E-R-N and it's cut
 8
     off.
9
               Yeah, kernel.
10
          Α
               Yeah. So would that mean that this has
11
          Q
12
     been -- already been programmed with kernel?
               Yeah. All the PCSS units have to have
13
          Α
     the kernel.
14
15
          0
               Okay.
16
               But the Isagraf is the program that run
     the machine. Without Isagraf the PCSS is useless.
17
               Okay. All right. I'm just gonna show
18
          Q
     you another photo we have, Exhibit 10.
19
                   (Exhibit 10 marked for
20
                   identification.)
21
               And this is -- marking this Exhibit 10.
22
          Q
                   (Screen sharing.)
23
          Q
               Do you recognize this -- what's shown in
24
```

EXHIBIT C

1	d: 10894
	is: resolved
Priori	ry: Low
	e: <u>Ermaksan</u>
Custom Fields	
Category: PCSS	
People	
Own	er: mehmet (Mehmet Tatli)
	s: <u>ALI EVCI <ali.evci@ermaksan.com.tr></ali.evci@ermaksan.com.tr></u>
	<service@ermaksan.com.tr></service@ermaksan.com.tr>
	ic:
AdminC	
image004.png <u>Mon Nov 25 13:30:28 2019 (2.6KiB) by met</u> image005.png <u>Mon Nov 25 13:30:28 2019 (4.6KiB) by met</u> image007.png	met (Mehmet Tatli)
Mon Nov 25 13:30:28 2019 (35.4KiB) by me image008.png Mon Nov 25 13:30:28 2019 (34.8KiB) by me Show all	hmet (Mehmet Tatli)
Mon Nov 25 13:30:28 2019 (35.4KiB) by mo image008.png Mon Nov 25 13:30:28 2019 (34.8KiB) by mo Show all	
Mon Nov 25 13:30:28 2019 (35.4KiB) by me image008.png	om.tr>
Mon Nov 25 13:30:28 2019 (35.4KiB) by mo image008.png Mon Nov 25 13:30:28 2019 (34.8KiB) by mo Show all	
Mon Nov 25 13:30:28 2019 (35.4kiB) by money image 008.png Mon Nov 25 13:30:28 2019 (34.8kiB) by money 25 12:28 2019 (34.8kiB) by money 25	om.tr>
Mon Nov 25 13:30:28 2019 (35.4kiB) by moders image008.png	om.tr>
Mon Nov 25 13:30:28 2019 (35.4kiB) by motimage 008.png Mon Nov 25 13:30:28 2019 (34.8kiB) by motimage 35 Now all More about the requestors ALI EVCI <ali.evci@ermaksan.co <service@ermaksan.com.tr=""> eminders</ali.evci@ermaksan.co>	om.tr>
Mon Nov 25 13:30:28 2019 (35.4kiB) by me image 008.png	om.tr>
Mon Nov 25 13:30:28 2019 (35.4kiB) by motimage 008.png Mon Nov 25 13:30:28 2019 (34.8kiB) by motimage 008.png More about the requestors ALI EVCI <ali.evci@ermaksan.co <service@ermaksan.com.tr=""> eminders New reminder: Subject: Owner: John.Bar</ali.evci@ermaksan.co>	om.tr>
Mon Nov 25 13:30:28 2019 (35.4kiB) by me image 008.png	om.tr>

Dates

Created: Mon Oct 07 16:56:24 2019

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Started: Mon Oct 07 17:11:42 2019

Last Contact: Mon Nov 25 13:30:29 2019

Due: Wed Oct 09 16:56:24 2019

Closed: Fri Nov 29 17:18:11 2019

Updated: Fri Nov 29 17:18:11 2019 bymehmet (Mehmet Tatli)

Links

Depends on:

Depended on by:

Parents:

Children:

Refers to:

Referred to by:

Create new | Depends on ▼ | Ticket in | Accurl ▼ | Create

History

Fri Nov 29 17:18:11 2019 The RT System itself - Outgoing email recorded

Fri Nov 29 17:18:11 2019 mehmett (Mehmet Tatli) - Status changed from 'open' to 'resolved'

Mon Nov 25 14:33:43 2019 The RT System itself - Outgoing email recorded

Mon Nov 25 14:33:43 2019 The RT System itself - Outgoing email recorded

-30016-MGM Document 108-1 Filed 11/26/25 ALI EVCI <ali.evci@ermaksan.com.tr> - Correspondence added Case 3:23-cv-30016-MGM Mon Nov 25 14:33:42 2019 ALI EVCI <ali.evci@e Page 44 of 189

CC: UFUK KOCAEL <ufuk.kocael@ermakusa.com>, UMIT YILDIZ <umit.yildiz@ermaksan.com.tr>, SERVICE <service@ermaksan.com.tr> Subject: RE: [rt.lazersafe.com.au #10894] FW: Lazer safe PCSS com. error (I need help please!)

Date: Mon, 25 Nov 2019 06:32:45 +0000

To: "customerservice@lazersafe.com.au" <customerservice@lazersafe.com.au>

From: ALI EVCI <ali.evci@ermaksan.com.tr>

Hello Mr. Mehmet,

We have not been able to direct service yet. You can close the topic if you want. We will contact you again if needed. Because we cannot say anything

clear at the moment. Thank you for your interest. Best Regards, - Hide quoted text -----Original Message-----From: Mehmet Tatli via RT [mailto:customerservice@lazersafe.com.au] Sent: Monday, November 25, 2019 8:30 AM To: ALI EVCI; SERVICE Subject: RE: [rt.lazersafe.com.au #10894] FW: Lazer safe PCSS com. error (I need help please!) Hello Ali, Ümit, What is the latest status on this issue? Regards Mehmet TATLI Customer Service Lazer Safe Pty Ltd 27 Action Road Malaga, WA 6090 Australia T+618 9249 4388 F +61 8 9249 6011 M +90 532 566 6879 E mehmet.tatli@lazersafe.com Follow Us: cid:image001.png@01D31FEB.802721 20 cid:image002.png@01D31FEB.80272120 cid:image003.png@01D31FEB.80272120 cid:image004.png@01D31FEB.80272120 cid :image005.png@01D31FEB.80272120 signature_14490615 29 ----Original Message----From: ALI EVCI via RT <customerservice@lazersafe.com.au>

Sent: Tuesday, October 15, 2019 9:12 AM

To: Mehmet Tatli <mehmet.tatli@lazersafe.com>

Subject: FW: [rt.lazersafe.com.au #10894] FW: Lazer safe PCSS com. error (I need help please!)

Hello Ufuk Abi,

An order for Lazersafe PCSS-F will be made for a 2007 model machine in the USA that has a Lazersafe problem, but its program is needed. The program for this machine is not in our records. Can you do or have someone do what Mehmet Bey said below? This way we can see the name of the program in the PCSS and load it into the new one.

Best Regards,
Original Message
From: Mehmet Tatli via RT [mailto:customerservice@lazersafe.com.au]
Sent: Tuesday, October 15, 2019 9:02 AM
To: ALI EVCI; SERVICE
Subject: RE: [rt.lazersafe.com.au #10894] FW: Lazer safe PCSS com. error (I need help please!)
Good morning Ali,
is there anyone in America who can try to flash the kernel and isagraf to the faulty PCSS?
Regards
Mehmet TATLI
Customer Service
Lazer Safe Pty Ltd
27 Action Road
Malaga, WA 6090
Australia
T +61 8 9249 4388
F +61 8 9249 6011
M +90 532 566 6879
E mehmet.tatli@lazersafe.com
Follow Us:
Original Message
From: ALI EVCI via RT <customerservice@lazersafe.com.au></customerservice@lazersafe.com.au>
Sent: Tuesday, October 15, 2019 8:43 AM
To: Mehmet Tat l i <mehmet.tatli@lazersafe.com></mehmet.tatli@lazersafe.com>
Subject: RE: [rt.lazersafe.com.au #10894] FW: Lazer safe PCSS com. error (I need help please!)
Hello Mehmet,
Since we will direct the order to the address directly, we prefer to have the upload done and sent, but we need your help with the program because we do not have which program installed in our records. Can you help me find it? I am attaching the PCSS photo on the machine, the machine parameters, and the project.
Possible shipping address;
ErmakUSA Inc.
2860 S River Rd, Suite 145,
Des Plaines,IL 60018
USA
Best Regards,
From: Mehmet Tat l i Sent: Friday, October 18, 2019 10:27 AM

To: UMIT YILDIZ <umit.yildiz@ermaksan.com.tr>; Customer Service (Lazersafe) <csresponder@lazersafe.com>

Subject: RE: [rt.lazersafe.com.au #10894] FW: Lazer safe PCSS com. error (I need help please!)

rt.lazersafe.com.au/Ticket/Display.html?id=10894

Cc: YEDEK_PARCA <sparepart@ermaksan.com.tr>

Hello Ümit,
The shipping fee for 1 x PCSS-F1 to the specified American address is approximately 95 EURO (DAP).
Regards
Mehmet TATLI
Customer Service
Lazer Safe Pty Ltd
27 Action Road
Malaga, WA 6090
Australia
T +61 8 9249 4388
F +61 8 9249 6011
M +90 532 566 6879
E mehmet.tatli@lazersafe.com
Follow Us:
cid:image001.png@01D31FEB.802721 20 cid:image002.png@01D31FEB.80272120 cid:image003.png@01D31FEB.80272120
cid:image004.png@01D31FEB.80272120
cid:image005.png@01D31FEB.80272120
cid:image008.png@01D5A30E.16363AA0 signature_1449061529
From: Mehmet Tatli Sent: Tuesday, October 15, 2019 5:36 PM To: UMIT YILDIZ <umit.yildiz@ermaksan.com.tr>; Customer Service (Lazersafe) <csresponder@lazersafe.com> Cc: YEDEK_PARCA <sparepart@ermaksan.com.tr> Subject: Re: [rt.lazersafe.com.au #10894] FW: Lazer safe PCSS com. error (I need help please!)</sparepart@ermaksan.com.tr></csresponder@lazersafe.com></umit.yildiz@ermaksan.com.tr>
Ümit Bey,
Ali Bey gave me the address below, that's why I asked for a price, I will probably get an answer tomorrow.
ErmakUSA Inc.
2860 S River Rd, Suite 145,
Des Plaines,IL 60018
USA
Thank you
Mehmet Tatlı
Customer Service
Lazer Safe Pty Ltd
25 Action Road
Malaga, WA 6090
Australia
T +61 8 9249 4388
F +61 8 9249 6011

E mehmet.tatli@lazersafe.com

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http://clients.axiomdp.com.au/lazersafe/email/img/laz-icon-linkedin.png (http://clients.axiomdp.com.au/lazersafe/email/img/laz-icon-linkedin.png)

http://clients.axiomdp.com.au/lazersafe/email/img/laz-icon-youtube.png (http://clients.axiomdp.com.au/lazersafe/email/img/laz-icon-youtube.png)

Lazer Safe Logo

Performance without compromise.

.....

From: UMIT YILDIZ <umit.yildiz@ermaksan.com.tr> Sent: Tuesday, October 15, 2019 5:28:28 PM

To: Mehmet Tatli <mehmet.tatli@lazersafe.com>; Customer Service (Lazersafe) <csresponder@lazersafe.com>

Cc: YEDEK_PARCA <sparepart@ermaksan.com.tr>

Subject: RE: [rt.lazersafe.com.au #10894] FW: Lazer safe PCSS com. error (I need Hello

Mr. Mehmet;

Can you give me a shipping fee for the address below?

Best regards.

----Original Message----

From: Mehmet Tatli [mailto:mehmet.tatli@lazersafe.com]

Sent: Tuesday, October 15, 2019 9:48 AM

To: UMIT YILDIZ <umit.yildiz@ermaksan.com.tr>; Customer Service (Lazersafe) <csresponder@lazersafe.com>

Cc: YEDEK_PARCA <sparepart@ermaksan.com.tr>

Subject: RE: [rt.lazersafe.com.au #10894] FW: Lazer safe PCSS com. error (I need help please!)

Hello Ümit,

Since it is a product that is only sold as a spare part and is planned to be discontinued next year, the prices are unfortunately high as you said.

You can convert the connection from the old generation PCSS-F1 to the new generation PCSS-A1.

There is already an electrical project and PCSS program at Ermaksan for the PCSS-A1 + Delemli machine, this work can be done through it, but at this stage the cables will need to be removed from F1 and connected to A1 one by one.

According to the attached ECP, the production of old generation PCSS'Fx's will be finished as of the beginning of next year, so in any case, such conversion projects will need to be done. This job is difficult at this stage, but for the future, our suggestion is to prepare a ready-made cable kit with sockets/connectors for the conversion and make the job easier.

Regards

Mehmet TATLI

Customer Service

Lazer Safe Pty Ltd

27 Action Road

Malaga, WA 6090

Australia

T +61 8 9249 4388

F +61 8 9249 6011

M +90 532 566 6879

E mehmet.tatli@lazersafe.com

Follow Us:

----Original Message----

From: UMIT YILDIZ <umit.yildiz@ermaksan.com.tr>

Sent: Tuesday, October 15, 2019 9:31 AM

To: Mehmet Tatli <mehmet.tatli@lazersafe.com>; Customer Service (Lazersafe) <csresponder@lazersafe.com>

Cc: YEDEK_PARCA <sparepart@ermaksan.com.tr>

Subject: RE: [rt.lazersafe.com.au #10894] FW: Lazer safe PCSS com. error (I need help please!)

Hello Mehmet;

Best regards.

----Original Message----

From: Mehmet Tatli [mailto:mehmet.tatli@lazersafe.com]

Sent: Monday, October 14, 2019 7:07 PM

To: Customer Service (Lazersafe) <csresponder@lazersafe.com>

 $\label{lem:com.tr} \textbf{Cc: UM|T Y|LD|Z < umit.yi|diz@ermaksan.com.tr>; YEDEK_PARCA < sparepart@ermaksan.com.tr>; All the complex of the compl$

Subject: RE: [rt.lazersafe.com.au #10894] FW: Lazer safe PCSS com. error (I need help please!)

Hello Ümit,

1, The order code, description and price information for the product you have requested are as follows;

0013000700 --- PCSS-F IO01 w/Guard Counter 1 --- 3378.00 EURO

2, Do you know the name of the Isagraf Application (PCSS program) on the faulty PCSS?

Who will load the program to the PCSS? If Lazer Safe will do it, a copy of the program (.pia format) needs to be sent with the order.

The order code, description and fee for the loading fee are as follows;

ISAGRAF001 --- IsaGRAF loading charge --- 135.00 EURO

3, If you specify the address where the product will be sent, I can ask for a price, but as we have stated before, the actual price of the product will appear on the invoice, just so you know.

Regards

Mehmet TATLI

Customer Service

Lazer Safe Pty Ltd

27 Action Road

Malaga, WA 6090

Australia

T +61 8 9249 4388

F +61 8 9249 6011

M +90 532 566 6879

 ${\sf E\ mehmet.tatli@} \textbf{l} azers a fe.com$

Follow Us:

From: UMIT YILDIZ <umit.yildiz@ermaksan.com.tr>

Sent: Monday, October 14, 2019 3:47 PM

To: Mehmet Tatli <mehmet.tatli@lazersafe.com>
Cc: YEDEK_PARCA <sparepart@ermaksan.com.tr>

Subject: FW: Lazer safe PCSS com. error (I need help please!)

Hello Mehmet;

Can you send me an offer for the attached PCSS? The product is going to America. If possible, please send me the shipping cost.

Best regards.

----Original Message----

From: ALI EVCI via RT <customerservice@lazersafe.com.au>

Sent: Monday, October 7, 2019 1:34 PM

To: Mehmet Tatli <mehmet.tatli@lazersafe.com>

Subject: RE: [rt.lazersafe.com.au #10894] FW: Lazer safe PCSS com. error (I need help please!)

Hello Mehmet,

Thank you. For this topic, I will suggest the customer to send the PCSS for repair or replace it with a new one. You can close the topic.

Best Regards,

----Original Message-----

From: Mehmet Tatli via RT [mailto:customerservice@lazersafe.com.au]

Sent: Monday, October 07, 2019 12:12 PM

To: ALI EVCI; SERVICE

Subject: RE: [rt.lazersafe.com.au #10894] FW: Lazer safe PCSS com. error (I need help please!)

Hello Ali,

Thanks for the email.

According to the attached code description, trying to update the kernel software seems to be the only and last thing you can do.

As far as I understand from the photos, the protection system is LZS-004 HS(Cift Laser), so you can try installing the attached kernel version(Fx17700). If

that doesn't work, PCSS needs to be repaired(no guarantee that it can be repaired) or replaced with a new one.

In any case, the Isagraf application name(PCSS program) will be needed, I hope it is registered.

Regards Mehmet TATLI **Customer Service**

Lazer Safe Pty Ltd 27 Action Road Malaga, WA 6090 Australia T +61 8 9249 4388 F +61 8 9249 6011 M +90 532 566 6879

E mehmet.tatli@lazersafe.com Follow Us:

----Original Message----

From: ALI EVCI via RT <customerservice@lazersafe.com.au>

Sent: Monday, October 7, 2019 11:56 AM

Subject: [rt.lazersafe.com.au #10894] FW: Lazer safe PCSS com. error (I need help please!)

Hello,

Communication error appears at one of our 2007 pressbrake with Lazersafe PCSS and the code on PCSS dsplay is 2209. As far as we understand from the condition codes, this is "internal fault detected "error. Is there anything else that can be done other than replacing PCSS? The machine is in

Best Regards,

[imza]

From: Mehmet Tatli [mailto:mehmet.tatli@lazersafe.com]

Sent: Monday, October 07, 2019 8:31 AM

To: ALI EVCI Cc: SERVICE

Subject: RE: Lazer safe PCSS com. error (I need help please!)

Ali bey günaydın,

Emaili customerservice@lazersafe.com<mailto:customerservice@lazersafe.com> adresine göndermenizi rica ediyorum.

Regards

Mehmet TATLI **Customer Service**

Lazer Safe Pty Ltd 27 Action Road Malaga, WA 6090

Australia

T +61 8 9249 4388 F +61 8 9249 6011 M +90 532 566 6879

E mehmet.tatli@lazersafe.com<mailto:mehmet.tatli@lazersafe.com>

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< http://www.linkedin.com/company/lazer-safe-pty-ltd (http://www.linkedin.com/company/lazer-safe-pty-ltd) > [cid:image003.png@01D31FEB.80272120]

< https://www.youtube.com/user/lazersafe (https://www.youtube.com/user/lazersafe) >

 $[cid:image 004.png @ 01D31FEB.80272120] < \underline{\text{http://www.lazersafe.com/} (http://www.lazersafe.com/)} > [cid:image 004.png @ 01D31FEB.80272120] < \underline{\text{http://www.lazersafe.c$

 $[cid:image005.png@01D31FEB.80272120] < \\ \underline{\text{http://www.lazersafe.com/ (http://www.lazersafe.com/)}} > \\ \underline{\text{http://www.lazersafe.com/}} > \\ \underline{\text{http://www.$

[cid:image008.png@01D57CE9.7C452C70] [signature_1449061529]

From: ALI EVCI <ali.evci@ermaksan.com.tr<mailto:ali.evci@ermaksan.com.tr>>

Sent: Friday, October 4, 2019 5:14 PM

To: Mehmet Tatli <mehmet.tatli@lazersafe.com<mailto:mehmet.tatli@lazersafe.com>>

Cc: SERVICE <service@ermaksan.com.tr<mailto:service@ermaksan.com.tr>>

Subject: FW: Lazer safe PCSS com. error (I need help please!)

Mehmet Bey merhaba,

2007 model Lazersafe'li bir makinamızda Lazersafe communitication error hatası üzerine müşteriye PCSS 'i kontrol ettirdiğimizde PCSS displayinde 2209 hatası okuyoruz. Condition code lardan anladığımız kadarı ile "internal fault detected" hatası. PCSS'i değiştirmekten başka yapılabilcek bir şey varmıdır?

Makine Amerika'da.

Best Regards,

[imza]

From:

mmen ard @internation alcontainer co.com < mail to: mmen ard @internation alcontainer co.com > mmen ard @internation = mmen ard @internati

[mailto:mmenard@internationalcontainerco.com]

Sent: Friday, October 04, 2019 5:05 PM

To: ALI EVCI

Subject: RE: Lazer safe PCSS com. error (I need help please!)

The code I am getting is 2209

Thank You

Mike

----Original Message----

From: "ALI EVCI" <ali.evci@ermaksan.com.tr<mailto:ali.evci@ermaksan.com.tr>>

Sent: Friday, October 4, 2019 9:45am

< mmen ard @international container co.com < mail to: mmen ard @international container co.com >>

Cc: "SERVICE" <service@ermaksan.com.tr<mailto:service@ermaksan.com.tr>>

Subject: RE: Lazer safe PCSS com. error (I need help please!)

This feature differs according to operating mode, key position, indexation, manual page, automatic page. So, i could not say an excat info on this. If, you are doubt about Lazersafe system, you can check the code appearing on Lazersafe PCSS unit inside electrical cabinet. And again i advise you to check the communication cable between CNC and Lazersafe unit.

Best Regards,

[imza]

From:

mmen ard @international container co.com < mail to: mmen ard @international container co.com > mmen ard @international co.com > mmen ard @

[mailto:mmenard@internationalcontainerco.com]

Sent: Friday, October 04, 2019 4:11 PM

To: ALI EVCI

Subject: RE: Lazer safe PCSS com. error (I need help please!)

The laser to the front light curtain is not on. should that be on right when the interface comes on or does it come on only when you press the test button and start?

Thank You

Mike

----Original Message----

From: "ALI EVCI" <ali.evci@ermaksan.com.tr<mailto:ali.evci@ermaksan.com.tr>>

Sent: Friday, October 4, 2019 1:54am

To: "mmenard@internationalcontainerco.com<mailto:mmenard@internationalcontainerco.com>"

<mmenard@internationalcontainerco.com<mailto:mmenard@internationalcontainerco.com>>

Cc: "SENOL RODOPLU" <s.rodoplu@ermakusa.com<mailto:s.rodoplu@ermakusa.com>>,

"SERVICE" <service@ermaksan.com.tr<mailto:service@ermaksan.com.tr>>, "AHMET MEKIK"

 $<\! ahmet.mekik@ermaksan.com.tr<\! mailto: ahmet.mekik@ermaksan.com.tr>>,$

Subject: RE: Lazer safe PCSS com. error (I need help please!) Hello,

This error can be occured because of cable between controller and Lazersafe unit. It might me loosed.

Best Regards,

[imza]

From: HULYA YILMAZ

Sent: Thursday, October 03, 2019 5:54 PM To: UFUK KOCAEL; AHMET MEKIK; ALI EVCI

Cc: SENOL RODOPLU

Subject: FW: Lazer safe PCSS com. error (I need help please!)

Merhabalar,

Asagidaki sorunla ilgili yardimci olabilir misiniz?

Saygilarimla,

"Excellence in Fab Equipment Sales and Service"

[download]<http://www.ermakusa.com/usa/ (http://www.ermakusa.com/usa/)>

From:

mmen ard @internation alcontainer co.com < mail to: mmen ard @internation alcontainer co.com > mmen ard @internation alcontainer co.com < mail to: mmen are mail to:

< mmen ard @international container co.com < mail to: mmen ard @international container co.com >>

Sent: Thursday, October 3, 2019 9:43 AM

To: HULYA YILMAZ <h.yilmaz@ermakusa.com<mailto:h.yilmaz@ermakusa.com>>

Subject: Lazer safe PCSS com. error (I need help please!)

Good Morning,

I'm having an issue with my Ermak Pressbrake.

SN20071136

CNC SAP 12" X 220"

Brake ran fine this Morning and then the error message came up.

(D3156 : LazerSafe PCSS communication error) Please, Can you give me some guidance on how to fix this issue?

Im under the gun here and I need this machine up and running ASAP.

Thank You For your assistance

Michael menard International Container Co. 110 North Bridge St., Holyoke , Mass 01089 P: 1-413-246-7503

Mon Nov 25 13:30:29 2019 The RT System itself - Outgoing email recorded

8/21/24, 8:26 AM -30016-MGM Document 108-1 mehmet (Mehmet Tatli) - Correspondence added Case 3:23-cv-30016-MGM Mon Nov 25 13:30:28 2019 mehmet (Mehmet Ta Page 52 of 189

CC: YEDEK_PARCA <sparepart@ermaksan.com.tr>

Subject: RE: [rt.lazersafe.com.au #10894] FW: Lazer safe PCSS com. error (I need help please!)

Date: Mon, 25 Nov 2019 13:29:40 +0800

To: UMIT YILDIZ <umit.yildiz@ermaksan.com.tr>, "Customer Service (Lazersafe)" <csresponder@lazersafe.com>

From: Mehmet Tatli <mehmet.tatli@lazersafe.com>

Hello Mr. Ali, Mr. Umit,

What is the latest status on this issue?

Regards

Mehmet SWEET

Customer Service

Lazer Safe Pty Ltd T+61 8 9249 4388 Follow Us:

27 Action Road F +61 8 9249 6011 Malaga, WA 6090 M +90 532 566 6879

E mehmet.tatli@lazersafe.com Australia

(mailto:mehmet.tatli@lazersafe.com)

💟 (https://twitter.com/lazersafe) 🛅 (http://www.linkedin.com/company/lazersafe-pty-Itd)

(https://www.youtube.com/user/lazersafe)

Performance without compromise. (http://www.lazersafe.com/) lazersafe.com azersafe (http://www.lazersafe.com/)

FABTECH

Visit us at the Lazer Safe stand Stand A4188 & A4191 11 - 14 November 2019 · Chicago, USA

----Original Message----

From: ALI EVCI via RT <customerservice@lazersafe.com.au>

Sent: Tuesday, October 15, 2019 9:12 AM To: Mehmet Tatli <mehmet.tatli@lazersafe.com>

Subject: FW: [rt.lazersafe.com.au #10894] FW: Lazer safe PCSS com. error (I need help please!)

Hello Brother Ufuk,

A Lazersafe PCSS-F order will be made for the 2007 model machine in America that has a Lazersafe shortage, but the program is needed. The program on this machine is not in our records. Can you do or have done what Mr. Mehmet said below? In this way, we can see the name of the program in the PCSS and upload it to the new one.

Best Regards,

----Original Message----

From: Mehmet Tatli via RT [mailto:customerservice@lazersafe.com.au (mailto:customerservice@lazersafe.com.au).]

Sent: Tuesday, October 15, 2019 9:02 AM

To: ALI EVCI; SERVICE

Subject: RE: [rt.lazersafe.com.au #10894] FW: Lazer safe PCSS com. error (I need help please!)

Good morning Mr. Ali,

Is there anyone in the US who can try to install kernel and isagraph on the faulty PCSS?

Mehmet SWEET	
Customer Service	
Lazer Safe Pty Ltd	
27 Action Road	
Malaga, WA 6090	
Australia	
T +61 8 9249 4388	
F +61 8 9249 6011	
M +90 532 566 6879	
And mehmet.tatli@lazersafe.com (mailto:mehmet.tatli@lazersafe.com)	
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Original Message	
From: ALI EVCI via RT < customerservice@lazersafe.com.au (mailto:customerservice@lazersafe.com.au) >	
Sent: Tuesday, October 15, 2019 8:43 AM	
To: Mehmet Tatli < mehmet.tatli@lazersafe.com (mailto:mehmet.tatli@lazersafe.com)_>	
Subject: RE: [rt.lazersafe.com.au #10894] FW: Lazer safe PCSS com. error (I need help please!)	
Hello Mr. Mehmet,	
Since we will direct the order to the address directly, we prefer the upload and sending, but we need your help with the pr do not have which program is loaded in our records. Can you help me find it? I am attaching the PCSS photo on the machine, the ma and the project.	
Possible shipping address;	
ErmakUSA Inc.	
2860 S River Rd, Suite 145,	
Des Plaines, IL 60018	
deer	
Best Regards,	
From: Mehmet Tatli Sent: Friday, October 18, 2019 10:27 AM To: UMIT YILDIZ <umit.yildiz@ermaksan.com.tr>; Customer Service (Lazersafe) <csresponder@lazersafe.com> Cc: YEDEK_PARCA <sparepart@ermaksan.com.tr> Subject: RE: [rt.lazersafe.com.au #10894] FW: Lazer safe PCSS com. error (I need help please!)</sparepart@ermaksan.com.tr></csresponder@lazersafe.com></umit.yildiz@ermaksan.com.tr>	
Hello Mr. Umit,	
Shipping cost for 1 x PCSS-F1 to the specified US address is approximately 95 EURO (DAP).	
Regards	
Mehmet SWEET	
Customer Service	

8/21/24, 8:26 AM Lease 3; 23-cv-30016 MGM.

Document of the control of the contr

Page 54 of 189

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Malaga, WA 6090 M +90 532 566 6879

Australia E mehmet.tatli@lazersafe.com

(mailto:mehmet.tatli@lazersafe.com)

(https://twitter.com/lazersafe) 👔 (http://www.linkedin.com/company/lazersafe-pty-ltd) 🔠

(https://www.youtube.com/user/lazersafe)



Performance without compromise.™ (http://www.lazersafe.com/)

lazersafe.com

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FABTECH

Visit us at the Lazer Safe stand Stand A4188 & A4191 11 - 14 November 2019 · Chicago, USA

From: Mehmet Tatli

Sent: Tuesday, October 15, 2019 5:36 PM

To: UMIT YILDIZ <umit.yildiz@ermaksan.com.tr (mailto:umit.yildiz@ermaksan.com.tr) >; Customer Service (Lazersafe)

<csresponder@lazersafe.com (mailto:csresponder@lazersafe.com) >

Cc: YEDEK_PARCA <<u>sparepart@ermaksan.com.tr (mailto:sparepart@ermaksan.com.tr)</u> > Subject: Re: [rt.lazersafe.com.au #10894] FW: Lazer safe PCSS com. error (I need help please!)

Mr. Umit,

Mr. Ali gave me the address below, that's why I asked for the price, I will probably get an answer tomorrow.

ErmakUSA Inc.

2860 S River Rd, Suite 145,

Des Plaines, IL 60018

deer

Thank you

Mehmet Tatli

Customer Service

Lazer Safe Pty Ltd

25 Action Road

Malaga, WA 6090

Australia

T +61 8 9249 4388

F +61 8 9249 6011

M +90 532 566 6879

And mehmet.tatli@lazersafe.com (mailto:mehmet.tatli@lazersafe.com)

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Performance without compromise.

From: UMIT YILDIZ < umit.yildiz@ermaksan.com.tr) >

Sent: Tuesday, October 15, 2019 5:28:28 PM

To: Mehmet Tatli mehmet.tatli@lazersafe.com">"mailto:mehmet.tatli@lazersafe.com">"Customer Service (Lazersafe)

<csresponder@lazersafe.com (mailto:csresponder@lazersafe.com) >

Cc: YEDEK_PARCA < <pre>sparepart@ermaksan.com.tr (mailto:sparepart@ermaksan.com.tr) >
Subject: RE: [rt.lazersafe.com.au #10894] FW: Lazer safe PCSS com. error (I need help please!)

Hello Mehmet;

Can you give me a shipping fee for the following address?

Best regards.

----Original Message----

From: Mehmet Tatli [mailto:mehmet.tatli@lazersafe.com (mailto:mehmet.tatli@lazersafe.com)]

Sent: Tuesday, October 15, 2019 9:48 AM

To: UMIT YILDIZ < umit.yildiz@ermaksan.com.tr (mailto:umit.yildiz@ermaksan.com.tr) >; Customer Service (Lazersafe) <

<u>csresponder@lazersafe.com (mailto:csresponder@lazersafe.com)</u> >

Cc: YEDEK_PARCA < sparepart@ermaksan.com.tr) >

Subject: RE: [rt.lazersafe.com.au #10894] FW: Lazer safe PCSS com. error (I need help please!)

Hello Ümit Bev.

Since it is a product that is only sold as a spare part and is planned to be discontinued next year, the prices are unfortunately high as you said.

You can convert the connection from the old generation PCSS-F1 to the new generation PCSS-A1. Currently, there is an electrical project and PCSS program at Ermaksan for the PCSS-A1 + Delemli machine, this work can be done through it, but at this stage the cables will need to be removed from F1 and connected to A1 one by one.

According to the attached ECP, the production of old generation PCSS'Fx's will be finished as of the beginning of next year, so in any case, such conversion projects will need to be done. This work is difficult at this stage, but our suggestion for the future is to prepare a ready-made cable kit with sockets/connectors for the conversion and make the job easier.

Regards

Mehmet TATLI Customer Service

Lazer Safe Pty Ltd 27 Action Road Malaga, WA 6090 Australia T +61 8 9249 4388

F +61 8 9249 6011 M +90 532 566 6879

E mehmet.tatli@lazersafe.com (mailto:mehmet.tatli@lazersafe.com)

Follow Us:

----Original Message-----

From: UMIT YILDIZ < umit.yildiz@ermaksan.com.tr (mailto:umit.yildiz@ermaksan.com.tr) >

Sent: Tuesday, October 15, 2019 9:31 AM

To: Mehmet Tatli < mehmet.tatli@lazersafe.com (mailto:mehmet.tatli@lazersafe.com) >; Customer Service (Lazersafe) <

<u>csresponder@lazersafe.com (mailto:csresponder@lazersafe.com)</u> >

Cc: SPARE_PARCA < sparepart@ermaksan.com.tr) >

Subject: RE: [rt.lazersafe.com.au #10894] FW: Lazer safe PCSS com. error (I need help please!)

Hello Mr. Mehmet;

Thank you for your offer, but the product price is too expensive. Can't the current product link be made instead? Can you provide information?

Best regards.

----Original Message----

From: Mehmet Tatli [mailto:mehmet.tatli@lazersafe.com (mailto:mehmet.tatli@lazersafe.com)]

Sent: Monday, October 14, 2019 7:07 PM

To: Customer Service (Lazersafe) < <u>csresponder@lazersafe.com (mailto:csresponder@lazersafe.com)</u> >

Cc: UMIT YILDIZ < umit.yildiz@ermaksan.com.tr); YEDEK_PARCA < sparepart@ermaksan.com.tr (mailto:sparepart@ermaksan.com.tr).>

Subject: RE: [rt.lazersafe.com.au #10894] FW: Lazer safe PCSS com. error (I need help please!)

Hello Ümit,

1, The order code, description and price information for the product you have requested are as follows;

0013000700 --- PCSS-F IO01 w/Guard Counter 1 --- 3378.00 EURO

2, Do you know the name of the Isagraf Application (PCSS program) on the faulty PCSS? Who will upload the program to the PCSS? If Lazer Safe will do it, a copy of the program (.pia format) must be sent with the order. The order code, description and fee for the upload fee are as follows;

ISAGRAF001 --- IsaGRAF loading charge --- 135.00 EURO

Regards Mehmet TATLI **Customer Service**

Lazer Safe Pty Ltd 27 Action Road Malaga, WA 6090 Australia T +61 8 9249 4388 F +61 8 9249 6011 M +90 532 566 6879

E mehmet.tatli@lazersafe.com (mailto:mehmet.tatli@lazersafe.com)

From: UMIT YILDIZ < umit.yildiz@ermaksan.com.tr) >

Sent: Monday, October 14, 2019 3:47 PM

To: Mehmet Tatli < mehmet.tatli@lazersafe.com (mailto:mehmet.tatli@lazersafe.com) > Cc: YEDEK_PARCA < sparepart@ermaksan.com.tr) > Subject: FW: Lazer safe PCSS com. error (I need help please!)

Hello Mehmet;

Can you send me an offer for the attached PCSS? The product is going to America. If possible, please send me the shipping cost.

Best regards.

----Original Message----

From: ALI EVCI via RT < customerservice@lazersafe.com.au (mailto:customerservice@lazersafe.com.au)_>

Sent: Monday, October 7, 2019 1:34 PM

 $\label{to:mehmet_tatli} \textbf{To: Mehmet Tatli} < \underline{\textbf{mehmet.tatli@lazersafe.com}} \ | \textbf{mehmet.tatli@lazersafe.com}) > \\ \textbf{To: Mehmet Tatli} < \underline{\textbf{mehmet.tatli@lazersafe.com}} \ | \textbf{To: Mehmet.tatli} = \textbf{To: Mehmet.tatli}$

Subject: RE: [rt.lazersafe.com.au #10894] FW: Lazer safe PCSS com. error (I need help please!)

Hello Mehmet,

Thank you. For this topic, I will suggest the customer to send the PCSS for repair or replace it with a new one. You can close the topic.

Best Regards.

----Original Message----

From: Mehmet Tatli via RT [mailto:customerservice@lazersafe.com.au (mailto:customerservice@lazersafe.com.au)_1

Sent: Monday, October 07, 2019 12:12 PM

To: ALI EVCI; SERVICE

Subject: RE: [rt.lazersafe.com.au #10894] FW: Lazer safe PCSS com. error (I need help please!)

Hello Mr. Ali.

Thanks for the email.

According to the attached code description, it seems like the only and last thing you can do is try to update the kernel software.

As far as I understand from the photos, the protection system is LZS-004 HS(Double Laser), so you can try to install the attached kernel version(Fx17700)

If it doesn't work, PCSS needs to be repaired(no guarantee that it can be done) or replaced with a new one.

In any case, I hope the Isagraf application name(PCSS program) is needed, it is registered.

Regards Mehmet TATLI **Customer Service**

Lazer Safe Pty Ltd 27 Action Road Malaga, WA 6090 Australia T +61 8 9249 4388 F +61 8 9249 6011 M +90 532 566 6879

E mehmet.tatli@lazersafe.com (mailto:mehmet.tatli@lazersafe.com)

Follow Us:

----Original Message----

From: ALI EVCI via RT < customerservice (mailto:customerservice@lazersafe.com.au) @lazersafe.com.au >

Sent: Monday, October 7, 2019 11:56 AM

Subject: [rt.lazersafe.com.au #10894] FW: Lazer safe PCSS com. error (I need help please!)

Communication error appears at one of our 2007 pressbrake with Lazersafe PCSS and the code on PCSS dsplay is 2209. As far as we understand from the condition codes, this is "internal fault detected "error. Is there anything else that can be done other than replacing PCSS? The machine is in America.

Best Regards, [signature]

From: Mehmet Tatli [mailto:mehmet.tatli@lazersafe.com (mailto:mehmet.tatli@lazersafe.com)]

Sent: Monday, October 07, 2019 8:31 AM

To: ALI EVCI Cc: SERVICE

Subject: RE: Lazer safe PCSS com. error (I need help please!)

Good morning Mr. Ali, I would like you to send

the e-mail to <u>customerservice@lazersafe.com<mailto:customerservice@lazersafe.com</u>(mailto:customerservice@lazersafe.com)

>. Regards

Mehmet TATLI Customer Service

Lazer Safe Pty Ltd 27 Action Road Malaga, WA 6090 Australia

T +61 8 9249 4388 F +61 8 9249 6011 M +90 532 566 6879

E <u>mehmet.tatli@lazersafe.com<mailto:mehmet.tatli@lazersafe.com</u> (mailto:mehmet.tatli@lazersafe.com) >

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[cid:image005.png@01D31FEB.80272120]<<u>(http://www.lazersafe.com/) http://www.lazersafe.com/ (http://www.lazersafe.com/)</u>>

[cid:image008.png@01D57CE9.7C452C70] [signature_1449061529]

From: ALI EVCI < <u>ali.evci@ermaksan.com.tr<mailto:ali.evci@ermaksan.com.tr</u> (<u>mailto:ali.evci@ermaksan.com.tr%3cmailto:ali.evci@ermaksan.com.tr)</u>>>

Sent: Friday, October 4, 2019 5:14 PM

To: Mehmet Tatli < mehmet.tatli@lazersafe.com<mailto:mehmet.tatli@lazersafe.com

(mailto:mehmet.tatli@lazersafe.com%3cmailto:mehmet.tatli@lazersafe.com).>> Cc: SERVICE < service@ermaksan.com.tr <a href="mailto:service@e

(mailto:service@ermaksan.com.tr%3cmailto:service@ermaksan.com.tr) >>

Subject: FW: Lazer safe PCSS com. error (I need help please!)

Hello Mr. Mehmet,

when we have the customer check the PCSS on a Lazersafe communication error in a 2007 model Lazersafe machine, we read the 2209 error on the PCSS display. As far as we understand from the condition codes, the error is "internal fault detected". PCSS Is there anything else that can be done other than changing the? The machine is in America.

Best Regards,

[signature]

From: mmenard@internationalcontainerco.com<mailto:mmenard@internationalcontainerco.com
(mailto:mmenard@internationalcontainerco.com%3cmailto:mmenard@internationalcontainerco.com) > [
mailto:mmenard@internationalcontainerco.com (mailto:mmenard@internationalcontainerco.com)]

Sent: Friday, October 04, 2019 5:05 PM

To: ALI EVCI

Subject: RE: Lazer safe PCSS com. error (I need help please!)

The code I am getting is 2209

Thank You

Mike

----Original Message----

From: "ALI EVCI" < <u>ali.evci@ermaksan.com.tr<mailto:ali.evci@ermaksan.com.tr)</u>>>

Sent: Friday, October 4, 2019 9:45am

To: "mmenard@internationalcontainerco.com>

 $\underline{\text{(}\textit{mailto:} mmenard@international container co.com\%3cmailto:} mmenard@international container co.com\%3e\underline{)}\text{ "}} < \underline{\text{(}\textit{mailto:} mmenard@international container co.com\%3e\underline{)}}\text{ "}} < \underline{\text{(}\textit{mailto:} mmenard@international container co.com\%3e\underline{)}}\text{ "}}$

8/21/24, 8:26 AM Case 3:23 CV = 3.0016 - MGM | Double FW. Lazer, safe PCSS com. error (I need belt please) / 25 Page 58 of 189

(mailto:mmenard@internationalcontainerco.com%3cmailto:mmenard@internationalcontainerco.com) >

 $\texttt{Cc: "SERVICE"} < \underline{\textbf{service@ermaksan.com.tr} < \textbf{mailto:service@ermaksan.com.tr}}$

(mailto:service@ermaksan.com.tr) >>

Subject: RE: Lazer safe PCSS com. error (I need help please!)

This feature differs according to operating mode, key position, indexation, manual page, automatic page. So, i could not say an excat info on this. If you are in doubt about Lazersafe system, you can check the code appearing on Lazersafe PCSS unit inside electrical cabinet. And again I advise you to check the communication cable between CNC and Lazersafe unit.

Best Regards,

[signature]

From: mmenard@internationalcontainerco.com
(mailto:mmenard@internationalcontainerco.com) > [mailto:mmenard@internationalcontainerco.com) > [mailto:mmenard@internationalcontainerco.com (mailto:mmenard@internationalcontainerco.com)]

Sent: Friday, October 04, 2019 4:11 PM

To: ALI EVC

Subject: RE: Lazer safe PCSS com. error (I need help please!)

The laser to the front light curtain is not on, should that be on right when the interface comes on or does it come on only when you press the test button and start?

Thank You

Mike

----Original Message----

From: "ALI EVCI" ali.evci@ermaksan.com.tr (mailto:ali.evci@ermaksan.com.tr%3cmailto:ali.evci@ermaksan.com.tr)>>

Sent: Friday, October 4, 2019 1:54am

To: "mmenard@internationalcontainerco.com<mailto:mmenard@internationalcontainerco.com>

(mailto:mmenard@internationalcontainerco.com%3cmailto:mmenard@internationalcontainerco.com%3e) "

<mmenard@internationalcontainerco.com<mailto:mmenard@internationalcontainerco.com</p>

(mailto:mmenard@internationalcontainerco.com%3cmailto:mmenard@internationalcontainerco.com) >>

Cc: "SENOL RODOPLU" < s.rodoplu@ermakusa.com<mailto:s.rodoplu@ermakusa.com

(mailto:s.rodoplu@ermakusa.com%3cmailto:s.rodoplu@ermakusa.com) >>, "SERVICE"

<service@ermaksan.com.tr<mailto:service@ermaksan.com.tr (mailto:service@ermaksan.com.tr%3cmailto:service@ermaksan.com.tr) >>,

"AHMET MEKIK" <<u>ahmet.mekik@ermaksan.com.tr<mailto:ahmet.mekik@ermaksan.com.tr</u>

(mailto:ahmet.mekik@ermaksan.com.tr%3cmailto:ahmet.mekik@ermaksan.com.tr) >>, "HULYA YILMAZ"

<h.yilmaz@ermakusa.com</h.yilmaz@ermakusa.com(mailto:h.yilmaz@ermakusa.com%3cmailto:h.yilmaz@ermakusa.com)>> Subject: RE: Lazer safe PCSS com. error (I need help please!) Hello,

This error can be occured because of cable between controller and Lazersafe unit. It might me loosed.

Best Regards,

[imza]

From: HULYA YILMAZ

Sent: Thursday, October 03, 2019 5:54 PM To: UFUK KOCAEL; AHMET MEKIK; ALI EVCI

Cc: SENOL RODOPLU

Subject: FW: Lazer safe PCSS com. error (I need help please!)

Merhabalar.

Asagidaki sorunla ilgili yardimci olabilir misiniz?

Saygilarimla

"Excellence in Fab Equipment Sales and Service"

[download]<(http://www.ermakusa.com/usa/).>

From: mmenard@internationalcontainerco.com<mailto:mmenard@internationalcontainerco.com

(mailto:mmenard@internationalcontainerco.com%3cmailto:mmenard@internationalcontainerco.com) >

 $<\!\!\underline{mmenard@international container co.com < mailto: mmenard@international co.com < mailt$

(mailto:mmenard@internationalcontainerco.com%3cmailto:mmenard@internationalcontainerco.com) >>

Sent: Thursday, October 3, 2019 9:43 AM

To: HULYA YILMAZ < h.yilmaz@ermakusa.com<mailto:h.yilmaz@ermakusa.com

(mailto:h.yilmaz@ermakusa.com%3cmailto:h.yilmaz@ermakusa.com) >>

Subject: Lazer safe PCSS com. error (I need help please!)

Good Morning,

I'm having an issue with my Ermak Pressbrake.

SN20071136

CNC SAP 12" X 220"

Brake ran fine this Morning and then the error message came up.

 $(\ D3156: LazerSafe\ PCSS\ communication\ error\)\ Please,\ Can\ you\ give\ me\ some\ guidance\ on\ how\ to\ fix\ this\ issue?$

Im under the gun here and I need this machine up and running ASAP.

Thank You For your assistance

Michael menard

8/21/24, 8:26 AM Case 3:23 - CV-30016-MGM Document 108-1 Filed 11/26/25 Page 59 of 189

110 North Bridge St., Holyoke , Mass 01089 P: 1-413-246-7503

Image displayed inline above
Image displayed inline above
Image displayed inline above
Image displayed inline above

Image displayed inline above
Image displayed inline above

Image displayed inline above

Fri Oct 18 15:27:58 2019 The RT System itself - Outgoing email recorded

CC: YEDEK_PARCA <sparepart@ermaksan.com.tr> Subject: RE: [rt.lazersafe.com.au #10894] FW: Lazer safe PCSS com. error (I need help please!)

Date: Fri, 18 Oct 2019 15:27:09 +0800

To: UMIT YILDIZ <umit.yildiz@ermaksan.com.tr>, "Customer Service (Lazersafe)" <csresponder@lazersafe.com>

From: Mehmet Tatli <mehmet.tatli@lazersafe.com>

Hello Mr. Umit,

Shipping cost for 1 x PCSS-F1 to the specified US address is approximately 95 EURO (DAP).

Regards

Mehmet SWEET

Customer Service

Lazer Safe Pty Ltd T+61 8 9249 4388

27 Action Road F +61 8 9249 6011 Malaga, WA 6090 M +90 532 566 6879

Australia E mehmet.tatli@lazersafe.com

(mailto:mehmet_tatli@lazersafe_com)

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lazersafe.com

Hall 1-FO - Stand 1FO-18 5 - 8 November 2019 · Stuttgart, Germany Visit us at the Lazer Safe stand FABTECH Stand A4188 & A4191 11 - 14 November 2019 · Chicago, USA

From: Mehmet Tatli

Sent: Tuesday, October 15, 2019 5:36 PM

To: UMIT YILDIZ <umit.yildiz@ermaksan.com.tr>; Customer Service (Lazersafe) <csresponder@lazersafe.com>

Cc: YEDEK_PARCA YEDEK_PARCA

Subject: Re: [rt.lazersafe.com.au #10894] FW: Lazer safe PCSS com. error (I need help please!)

Mr. Umit,

Mr. Ali gave me the address below, that's why I asked for the price, I will probably get an answer tomorrow.

ErmakUSA Inc.

2860 S River Rd, Suite 145,

Des Plaines, IL 60018

deer

Thank you

Mehmet Tatli

Customer Service

Lazer Safe Pty Ltd

Malaga, WA 6090

Australia

T+61892494388

F +61 8 9249 6011

M +90 532 566 6879

And mehmet.tatli@lazersafe.com (mailto:mehmet.tatli@lazersafe.com)

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(http://clients.axiomdp.com.au/lazersafe/email/img/laz-icon-linkedin.png) (http://clients.axiomdp.com.au/lazersafe/email/img/laz-iconyoutube.png) http://clients.axiomdp.com.au/lazersafe/email/img/laz-icon-youtube.png (http://clients.axiomdp.com.au/lazersafe/email/img/lazicon-youtube.png)

Lazer Safe Logo

Performance without compromise.

From: UMIT YILDIZ < umit.yildiz@ermaksan.com.tr (mailto:umit.yildiz@ermaksan.com.tr) > Sent: Tuesday, October 15, 2019 5:28:28 PM

To: Mehmet Tatli mehmet.tatli@lazersafe.com">">; Customer Service (Lazersafe)

<csresponder@lazersafe.com (mailto:csresponder@lazersafe.com) >

Cc: YEDEK_PARCA < sparepart@ermaksan.com.tr">sparepart@ermaksan.com.tr) > Subject: RE: [rt.lazersafe.com.au #10894] FW: Lazer safe PCSS com. error (I need help please!)

Hello Mehmet:

Can you give me a shipping fee for the following address?

Best regards.

----Original Message----

From: Mehmet Tatli [mailto:mehmet.tatli@lazersafe.com (mailto:mehmet.tatli@lazersafe.com)]

Sent: Tuesday, October 15, 2019 9:48 AM

To: UMIT YILDIZ < umit.yildiz@ermaksan.com.tr (mailto:umit.yildiz@ermaksan.com.tr) >; Customer Service (Lazersafe) < csresponder@lazersafe.com (mailto:csresponder@lazersafe.com) >

Cc: YEDEK_PARCA < sparepart@ermaksan.com.tr) >

Subject: RE: [rt.lazersafe.com.au #10894] FW: Lazer safe PCSS com. error (I need help please!)

Hello Ümit Bey,

Since it is a product that is only sold as a spare part and is planned to be discontinued next year, the prices are unfortunately high as you said.

You can convert the connection from the old generation PCSS-F1 to the new generation PCSS-A1. Currently, there is an electrical project and PCSS program at Ermaksan for the PCSS-A1 + Delemli machine, this work can be done through it, but at this stage the cables will need to be removed from F1 and connected to A1 one by one.

According to the attached ECP, the production of old generation PCSS'Fx's will be finished as of the beginning of next year, so in any case, such conversion projects will need to be done. This work is difficult at this stage, but our suggestion for the future is to prepare a ready-made cable kit with sockets/connectors for the conversion and make the job easier.

Regards

Mehmet TATLI **Customer Service**

Lazer Safe Pty Ltd 27 Action Road Malaga, WA 6090

Australia

T +61 8 9249 4388 F +61 8 9249 6011

M +90 532 566 6879

E mehmet.tatli@lazersafe.com (mailto:mehmet.tatli@lazersafe.com)

----Original Message----

From: UMIT YILDIZ < umit.yildiz@ermaksan.com.tr (mailto:umit.yildiz@ermaksan.com.tr) >

Sent: Tuesday, October 15, 2019 9:31 AM

To: Mehmet Tatli < mehmet.tatli@lazersafe.com (mailto:mehmet.tatli@lazersafe.com) >; Customer Service (Lazersafe) < csresponder@lazersafe.com (mailto:csresponder@lazersafe.com) >

Cc: SPARE_PARCA < sparepart@ermaksan.com.tr) >

Subject: RE: [rt.lazersafe.com.au #10894] FW: Lazer safe PCSS com. error (I need help please!)

Hello Mr. Mehmet:

Thank you for your offer, but the product price is too expensive. Can't the current product link be made instead? Can you provide information?

Best regards.

----Original Message----

From: Mehmet Tatli [mailto:mehmet.tatli@lazersafe.com (mailto:mehmet.tatli@lazersafe.com)_]

Sent: Monday, October 14, 2019 7:07 PM

To: Customer Service (Lazersafe) < <u>csresponder@lazersafe.com (mailto:csresponder@lazersafe.com)</u> >

Cc: UMIT YILDIZ < umit.yildiz@ermaksan.com.tr); YEDEK_PARCA < sparepart@ermaksan.com.tr (mailto:sparepart@ermaksan.com.tr).>

Subject: RE: [rt.lazersafe.com.au #10894] FW: Lazer safe PCSS com. error (I need help please!)

Hello Ümit,

1, The order code, description and price information for the product you have requested are as follows;

0013000700 --- PCSS-F IO01 w/Guard Counter 1 --- 3378.00 EURO

2, Do you know the name of the Isagraf Application (PCSS program) on the faulty PCSS? Who will upload the program to the PCSS? If Lazer Safe will do it, a copy of the program (.pia format) must be sent with the order. The order code, description and fee for the upload fee are as follows;

ISAGRAF001 --- IsaGRAF loading charge --- 135.00 EURO

3, If you specify the address where the product will be sent, I can ask for a price, but as we have stated before, the actual price of the product will appear on the invoice, just so you know.

Regards

Mehmet TATLI

Customer Service

Lazer Safe Pty Ltd 27 Action Road Malaga, WA 6090 Australia T +61 8 9249 4388

T +61 8 9249 4388 F +61 8 9249 6011

M +90 532 566 6879

E mehmet.tatli@lazersafe.com (mailto:mehmet.tatli@lazersafe.com)

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From: UMIT YILDIZ < <u>umit.yildiz@ermaksan.com.tr (mailto:umit.yildiz@ermaksan.com.tr)</u> >

Sent: Monday, October 14, 2019 3:47 PM

To: Mehmet Tatli < mehmet.tatli@lazersafe.com (mailto:mehmet.tatli@lazersafe.com) >

Cc: YEDEK_PARCA < <u>sparepart@ermaksan.com.tr (mailto:sparepart@ermaksan.com.tr)</u> >

Subject: FW: Lazer safe PCSS com. error (I need help please!)

Hello Mehmet;

Can you send me an offer for the attached PCSS? The product is going to America. If possible, please send me the shipping cost.

Best regards.

----Original Message----

From: ALI EVCI via RT < customerservice@lazersafe.com.au (mailto:customerservice@lazersafe.com.au) >

Sent: Monday, October 7, 2019 1:34 PM

To: Mehmet Tatli < mehmet.tatli@lazersafe.com (mailto:mehmet.tatli@lazersafe.com) >

Subject: RE: [rt.lazersafe.com.au #10894] FW: Lazer safe PCSS com. error (I need help please!)

Hello Mehmet,

Thank you. For this topic, I will suggest the customer to send the PCSS for repair or replace it with a new one. You can close the topic.

Best Regards,

----Original Message----

From: Mehmet Tatli via RT [mailto:customerservice@lazersafe.com.au (mailto:customerservice@lazersafe.com.au)]

Sent: Monday, October 07, 2019 12:12 PM

To: ALI EVCI; SERVICE

Subject: RE: [rt.lazersafe.com.au #10894] FW: Lazer safe PCSS com. error (I need help please!)

Hello Mr. Ali,

Thanks for the email.

According to the attached code description, it seems like the only and last thing you can do is try to update the kernel software.

As far as I understand from the photos, the protection system is LZS-004 HS(Double Laser), so you can try to install the attached kernel version(Fx17700).

If it doesn't work, PCSS needs to be repaired(no guarantee that it can be done) or replaced with a new one.

In any case, I hope the Isagraf application name(PCSS program) is needed, it is registered.

Regards

Mehmet TATLI

Customer Service

Document 108-1 Filed 11/26/25

Page 63 of 189

Lazer Safe Pty Ltd 27 Action Road Malaga, WA 6090 Australia T +61 8 9249 4388 F +61 8 9249 6011 M +90 532 566 6879

E mehmet.tatli@lazersafe.com (mailto:mehmet.tatli@lazersafe.com)

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----Original Message----

From: ALI EVCI via RT < <u>customerservice (mailto:customerservice@lazersafe.com.au)</u> @lazersafe. com.au >

Sent: Monday, October 7, 2019 11:56 AM

Subject: [rt.lazersafe.com.au #10894] FW: Lazer safe PCSS com. error (I need help please!)

Hello.

Communication error appears at one of our 2007 pressbrake with Lazersafe PCSS and the code on PCSS dsplay is 2209. As far as we understand from the condition codes, this is "internal fault detected "error. Is there anything else that can be done other than replacing PCSS? The machine is in America.

Best Regards, [signature]

From: Mehmet Tatli [mailto:mehmet.tatli@lazersafe.com (mailto:mehmet.tatli@lazersafe.com)_

Sent: Monday, October 07, 2019 8:31 AM

To: ALI EVCI Cc: SERVICE

Subject: RE: Lazer safe PCSS com. error (I need help please!)

Good morning Mr. Ali, I would like you to send

the e-mail to <u>customerservice@lazersafe.com<mailto:customerservice@lazersafe.com</u>(mailto:customerservice@lazersafe.com)

>. Regards

Mehmet TATLI Customer Service

Lazer Safe Pty Ltd 27 Action Road Malaga, WA 6090 Australia

T +61 8 9249 4388 F +61 8 9249 6011 M +90 532 566 6879

E <u>mehmet.tatli@lazersafe.com</u>mailto:mehmet.tatli@lazersafe.com).>
(mailto:mehmet.tatli@lazersafe.com).>

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[cid:image004.png@01D31FEB.80272120]<<u>(http://www.lazersafe.com/) http://www.lazersafe.com/ (http://www.lazersafe.com/)</u>>

[cid:image005.png@01D31FEB.80272120]</hr>

[cid:image008.png@01D57CE9.7C452C70] [signature_1449061529]

From: ALI EVCI < ali.evci@ermaksan.com.tr<mailto:ali.evci@ermaksan.com.tr (mailto:ali.evci@ermaksan.com.tr%3cmailto:ali.evci@ermaksan.com.tr).>>

Sent: Friday, October 4, 2019 5:14 PM

To: Mehmet Tatli < mehmet.tatli@lazersafe.com<mailto:mehmet.tatli@lazersafe.com

(mailto:mehmet.tatli@lazersafe.com%3cmailto:mehmet.tatli@lazersafe.com) >>

 $\label{eq:cc:Service} \textbf{Cc: SERVICE} < \underline{\textbf{service@ermaksan.com.tr}} < \underline{\textbf{mailto:service@ermaksan.com.tr}}$

(mailto:service@ermaksan.com.tr%3cmailto:service@ermaksan.com.tr) >>

Subject: FW: Lazer safe PCSS com. error (I need help please!)

Hello Mr. Mehmet,

when we have the customer check the PCSS on a Lazersafe communication error in a 2007 model Lazersafe machine, we read the 2209 error on the PCSS display. As far as we understand from the condition codes, the error is "internal fault detected". PCSS is there anything else that can be done other than changing the? The machine is in America.

[signature]

From: mmenard@internationalcontainerco.com<mailto:mmenard@internationalcontainerco.com
(mailto:mmenard@internationalcontainerco.com)> [
mailto:mmenard@internationalcontainerco.com (mailto:mmenard@internationalcontainerco.com)]

Sent: Friday, October 04, 2019 5:05 PM

To: ALI EVCI

Subject: RE: Lazer safe PCSS com. error (I need help please!)

The code I am getting is 2209

Thank You

Mike

----Original Message-----

From: "ALI EVCI" < ali.evci@ermaksan.com.tr<mailto:ali .evci@ermaksan.com.tr

(mailto:ali.evci@ermaksan.com.tr%3cmailto:ali.evci@ermaksan.com.tr) >>

Sent: Friday, October 4, 2019 9:45am

To: " mmenard@internationalcontainerco.com<mailto:mmenard@internationalcontainerco.com>

(mailto:mmenard@internationalcontainerco.com%3cmailto:mmenard@internationalcontainerco.com%3e) " <

 $\underline{mmenard@international container co.com < mailto: \underline{mmenard@international container co.com} < \underline{mailto: \underline{mmenard@international container co.com} < \underline{mmenard@international co.com} < \underline$

(mailto:mmenard@internationalcontainerco.com%3cmailto:mmenard@internationalcontainerco.com) >>

 $\label{eq:cc: "SERVICE" < } \underline{\textbf{service@ermaksan.com.tr} < \textbf{mailto:service@ermaksan.com.tr}} \\$

(mailto:service@ermaksan.com.tr%3cmailto:service@ermaksan.com.tr) >>

Subject: RE: Lazer safe PCSS com. error (I need help please!)

This feature differs according to operating mode, key position, indexation, manual page, automatic page. So, i could not say an excat info on this. If you are in doubt about Lazersafe system, you can check the code appearing on Lazersafe PCSS unit inside electrical cabinet. And again I advise you to check the communication cable between CNC and Lazersafe unit.

Best Regards,

[signature]

From: mmenard@internationalcontainerco.com
(mailto:mmenard@internationalcontainerco.com) > [
mailto:mmenard@internationalcontainerco.com (mailto:mmenard@internationalcontainerco.com) |

Sent: Friday, October 04, 2019 4:11 PM

To: ALI EVCI

Subject: RE: Lazer safe PCSS com. error (I need help please!)

The laser to the front light curtain is not on. should that be on right when the interface comes on or does it come on only when you press the test button and start?

Thank You

Mike

----Original Message----

From: "ALI EVCI" < ali.evci@ermaksan.com.tr<mailto:ali.evci@ermaksan.com.tr

(mailto:ali.evci@ermaksan.com.tr%3cmailto:ali.evci@ermaksan.com.tr) >>

Sent: Friday, October 4, 2019 1:54am

 $\label{to:mmenard@international} \textbf{To: "} \underline{\textbf{mmenard@internationalcontainerco.com} \\ < \underline{\textbf{mailto:mmenard@internationalcontainerco.com} \\ > \underline{\textbf{mmenard@internationalcontainerco.com} \\ > \underline{\textbf{mmenard@internationalcontainerco.com} \\ > \underline{\textbf{mmenard@internationalcontainerco.com} \\ > \underline{\textbf{mailto:mmenard@internationalcontainerco.com} \\ > \underline{\textbf{mailto:mmena$

 $\underline{(mail to:mmen ard @international container co.com \% 3 cmail to:mmen ard @international container co.com \% 3 e)_" (mail to:mmen ard @international container co.com \% 3 e)_" (mail to:mmen ard @international container co.com \% 3 e)_" (mail to:mmen ard @international container co.com \% 3 e)_" (mail to:mmen ard @international container co.com \% 3 e)_" (mail to:mmen ard @international container co.com \% 3 e)_" (mail to:mmen ard @international container co.com \% 3 e)_" (mail to:mmen ard @international container co.com \% 3 e)_" (mail to:mmen ard @international container co.com \% 3 e)_" (mail to:mmen ard @international container co.com \% 3 e)_" (mail to:mmen ard @international container co.com \% 3 e)_" (mail to:mmen ard @international container co.com \% 3 e)_" (mail to:mmen ard @international container co.com \% 3 e)_" (mail to:mmen ard @international container co.com \% 3 e)_" (mail to:mmen ard @international container co.com \% 3 e)_" (mail to:mmen ard @international container co.com \% 3 e)_" (mail to:mmen ard @international co.com \% 3 e)_" (mail to:mmen a$

< mmenard@internationalcontainerco.com < mailto:mmenard@internationalcontainerco.com

 $\underline{(mail to: mmenard@international container co.com \%3 cmail to: mmenard@international container co.com)} >> \\$

Cc: "SENOL RODOPLU" < s.rodoplu@ermakusa.com < mailto:s.rodoplu@ermakusa.com

(mailto:s.rodoplu@ermakusa.com%3cmailto:s.rodoplu@ermakusa.com) >>, "SERVICE

<service@ermaksan.com.tr<mailto:service@ermaksan.com.tr (mailto:service@ermaksan.com.tr%3cmailto:service@ermaksan.com.tr) >>, "AHMET MEKIK" ahmet.mekik@ermaksan.com.tr

 $\underline{(mail to:ahmet.mekik@ermaksan.com.tr)} >>, "HULYA YILMAZ"$

<h.vilmaz@ermakusa.com</h.vilmaz@ermakusa.com (mailto:h.vilmaz@ermakusa.com%3cmailto:h.vilmaz@ermakusa.com).>> Subject: RE: Lazer safe PCSS com. error (I need help please!) Hello,

This error can be occured because of cable between controller and Lazersafe unit. It might me loosed.

Best Regards,

[imza]

From: HULYA YILMAZ Sent: Thursday, October 03, 2019 5:54 PM To: UFUK KOCAEL; AHMET MEKIK; ALI EVCI Cc: SENOL RODOPLU

Subject: FW: Lazer safe PCSS com. error (I need help please!)

Merhabalar,

Asagidaki sorunla ilgili yardimci olabilir misiniz?

Saygilarimla,

"Excellence in Fab Equipment Sales and Service"

Document 108-1 Filed 11/26/25 Page 65 of 189

[download]<<u>(http://www.ermakusa.com/usa/)</u>.>

From: mmenard@internationalcontainerco.com
(mailto:mmenard@internationalcontainerco.com)
<mmenard@internationalcontainerco.com/3cmailto:mmenard@internationalcontainerco.com/>
<mmenard@internationalcontainerco.com</p>
(mailto:mmenard@internationalcontainerco.com/)
<menard@internationalcontainerco.com/</p>
(mailto:mmenard@internationalcontainerco.com/)
Sent: Thursday, October 3, 2019 9:43 AM

Subject: Lazer safe PCSS com. error (I need help please!)

Good Morning, I'm having an issue with my Ermak Pressbrake. SN20071136 CNC SAP 12' X 220"

Brake ran fine this Morning and then the error message came up.

(D3156: LazerSafe PCSS communication error) Please, Can you give me some guidance on how to fix this issue? Im under the gun here and I need this machine up and running ASAP.

Thank You For your assistance

Michael menard International Container Co. 110 North Bridge St., Holyoke , Mass 01089 P: 1-413-246-7503

Image displayed inline above
Image displayed inline above

Tue Oct 15 22:36:02 2019 The RT System itself - Outgoing email recorded

CC: YEDEK_PARCA <sparepart@ermaksan.com.tr>

Subject: Re: [rt.lazersafe.com.au #10894] FW: Lazer safe PCSS com. error (I need help please!)

Date: Tue, 15 Oct 2019 22:35:35 +0800

To: UMIT YILDIZ <umit.yildiz@ermaksan.com.tr>, "Customer Service (Lazersafe)" <csresponder@lazersafe.com>

From: Mehmet Tatli <mehmet.tatli@lazersafe.com>

Mr. Umit,

Mr. Ali gave me the address below, that's why I asked for the price, I will probably get an answer tomorrow.

ErmakUSA Inc. 2860 S River Rd, Suite 145, Des Plaines, IL 60018 deer

Thank you Mehmet Tat**l**i Customer Service

Lazer Safe Pty Ltd 25 Action Road Malaga, WA 6090 Australia

T +61 8 9249 4388 F +61 8 9249 6011 M +90 532 566 6879 And mehmet.tatli@lazersafe.com

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(http://clients.axiomdp.com.au/lazersafe/email/img/laz-icon-youtube.png)

Lazer Safe Logo

Performance without compromise.

From: UMIT YILDIZ <umit.yildiz@ermaksan.com.tr>
Sent: Tuesday, October 15, 2019 5:28:28 PM

To: Mehmet Tatli <mehmet.tatli@lazersafe.com>; Customer Service (Lazersafe) <csresponder@lazersafe.com>

Cc: YEDEK_PARCA <sparepart@ermaksan.com.tr>

Subject: RE: [rt.lazersafe.com.au #10894] FW: Lazer safe PCSS com. error (I need help please!)

Hello Mehmet;

Can you give me a shipping fee for the following address?

Best regards.

----Original Message-----

From: Mehmet Tatli [mailto:mehmet.tatli@lazersafe.com (mailto:mehmet.tatli@lazersafe.com).

Sent: Tuesday, October 15, 2019 9:48 AM

 $To: UMIT\ YILDIZ\ < umit.yiIdiz@ermaksan.com.tr>;\ Customer\ Service\ (Lazersafe)\ < csresponder@lazersafe.com>$

Cc: YEDEK_PARCA <sparepart@ermaksan.com.tr>

Subject: RE: [rt.lazersafe.com.au #10894] FW: Lazer safe PCSS com. error (I need help please!)

Hello Ümit Bey,

Since it is a product that is only sold as a spare part and is planned to be discontinued next year, the prices are unfortunately high as you said.

You can convert the connection from the old generation PCSS-F1 to the new generation PCSS-A1. Currently, there is an electrical project and PCSS program at Ermaksan for the PCSS-A1 + Delemli machine, this work can be done through it, but at this stage the cables will need to be removed from F1 and connected to A1 one by one.

According to the attached ECP, the production of old generation PCSS'Fx's will be finished as of the beginning of next year, so in any case, such conversion projects will need to be done. This work is difficult at this stage, but our suggestion for the future is to prepare a ready-made cable kit with sockets/connectors for the conversion and make the job easier.

Regards

Mehmet TATLI

Customer Service

Lazer Safe Pty Ltd

27 Action Road Malaga, WA 6090

Australia

T +61 8 9249 4388

F +61 8 9249 6011

M +90 532 566 6879

E mehmet.tatli@lazersafe.com

Follow Us:

----Original Message----

From: UMIT YILDIZ <umit.yildiz@ ermaksan.com.tr>

Sent: Tuesday, October 15, 2019 9:31 AM

To: Mehmet Tatli <mehmet.tatli@lazersafe.com>; Customer Service (Lazersafe) <csresponder@lazersafe.com>

Cc: SPARE_PARCA <sparepart@ermaksan.com.tr>

Subject: RE: [rt.lazersafe.com.au #10894] FW: Lazer safe PCSS com. error (I need help please!)

Hello Mehmet Bey;

Thank you for your offer, but the product price is too expensive. Can't a link to the current product be made instead? Can you provide information?

Best regards.

----Original Message----

From: Mehmet Tatli [mailto:mehmet.tatli@lazersafe.com (mailto:mehmet.tatli@lazersafe.com)]

Sent: Monday, October 14, 2019 7:07 PM

To: Customer Service (Lazersafe) <csresponder@lazersafe.com>

Cc: UMIT YILDIZ <umit.yildiz@ermaksan.com.tr>; YEDEK_PARCA <sparepart@ermaksan.com.tr> Subject: RE: [rt.lazersafe.com.au #10894] FW: Lazer safe PCSS com. error (I need help please!)

Hello Mr. Umit,

1, The order code, description and price information for the product you have requested are as follows;

0013000700 --- PCSS-F | O01 w/Guard Counter 1 --- 3378.00 EURO

2, Do you know the name of the Isagraf Application (PCSS program) on the faulty PCSS? Who will load the program to the PCSS? If Lazer Safe will do it, a copy of the program (.pia format) needs to be sent with the order. The order code, description and fee for the loading fee are as follows;

ISAGRAF001 --- IsaGRAF loading charge --- 135.00 EURO

3, I can ask for a price if you specify the address where the product will be sent, but as we have stated before, the actual price of the product will appear on the invoice, just so you know.

Regards

Mehmet TATL

Customer Service

Lazer Safe Pty Ltd

27 Action Road

Malaga, WA 6090

Australia

T +61 8 9249 4388

F +61 8 9249 6011

M +90 532 566 6879

E mehmet.tatli@lazersafe.com

Follow Us:

From: UMIT YILDIZ <umit.yildiz@ermaksan.com.tr>

Sent: Monday, October 14, 2019 3:47 PM To: Mehmet Tatli <mehmet.tatli@lazersafe.com> Case 3:23-cv-30016-MGM Document 108-1 Filed 11/26/25 Page 68 of 189

Subject: FW: Lazer safe PCSS com. error (I need help please!)

Hello Mehmet;

Can you send me an offer for the attached PCSS? The product is going to America. If possible, please send me the shipping cost.

Best regards.

----Original Message-----

From: ALI EVCI via RT <customerservice@lazersafe.com.au>

Sent: Monday, October 7, 2019 1:34 PM

To: Mehmet Tatli <mehmet.tatli@lazersafe.com>

Subject: RE: [rt.lazersafe.com.au #10894] FW: Lazer safe PCSS com. error (I need help please!)

Hello Mehmet,

Thank you. For this topic, I will suggest the customer to send the PCSS for repair or replace it with a new one. You can close the topic.

Best Regards,

----Original Message----

From: Mehmet Tatli via RT [mailto:customerservice@lazersafe.com.au (mailto:customerservice@lazersafe.com.au)_

Sent: Monday, October 07, 2019 12:12 PM

To: ALI EVCI; SERVICE

Subject: RE: [rt.lazersafe.com.au #10894] FW: Lazer safe PCSS com. error (I need help please!)

Hello Mr. Ali,

Thanks for your email.

According to the attached code description, trying to update the kernel software seems to be the only and last thing you can do.

As far as I understand from the photos, the protection system is LZS-004 HS(Double Laser), so you can try to install the attached kernel version(Fx17700).

If that doesn't work the PCSS will need to be repaired(no guarantee it can be fixed) or replaced.

In any case where the Isagraf application name(PCSS program) is needed, hopefully it is registered.

Regards

Mehmet TATLI

Customer Service

Lazer Safe Pty Ltd

27 Action Road

Malaga, WA 6090

Austra**l**ia

T +61 8 9249 4388

F +61 8 9249 6011

M +90 532 566 6879

E mehmet.tatli@lazersafe.com

Follow Us:

----Original Message----

From: ALI EVCI via RT <customerservice@lazersafe.com.au>

Sent: Monday, October 7, 2019 11:56 AM

Subject: [rt.lazersafe.com.au #10894] FW: Lazer safe PCSS com. error (I need help please!)

Hello,

Communication error appears at one of our 2007 pressbrake with Lazersafe PCSS and the code on PCSS dsplay is 2209. As far as we understand from the condition codes, this is "internal fault detected "error. Is there anything else that can be done other than replacing PCSS? The machine is in America.

Best Regards,

[signature]

Case 3:23-cv-30016-MGM Document 108-1 Fig. 11-26/25 From: Mehmet Tatli [mailto:mehmet.tatli@lazersafe.com (mailto:mehmet.tatli@lazersafe.com)]

Page 69 of 189

Sent: Monday, October 07, 2019 8:31 AM

To: ALI EVCI Cc: SERVICE

Subject: RE: Lazer safe PCSS com. error (I need help please!)

Good morning Mr. Ali,

I would like you to send the e-mail to customerservice@lazersafe.com<mailto:customerservice@lazersafe.com>.

Regards

Mehmet TATLI
Customer Service

Lazer Safe Pty Ltd 27 Action Road Malaga, WA 6090 Australia

T +61 8 9249 4388 F +61 8 9249 6011 M +90 532 566 6879

E mehmet.tatli@lazersafe.com<mailto:mehmet.tatli@lazersafe.com>

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[cid:image002.png@01D31FEB.80272120] < (http://www.linkedin.com/company/lazer-safe-pty-ltd)

[cid:image002.png@01D31FEB.80272120] < https://www.linkedin.com/company/lazer-safe-pty-ltd) >

[cid:image003.png@01D31FEB.80272120] < (https://www.youtube.com/user/lazersafe) >

[cid:image004.png@01D31FEB.80272120] < http://www.lazersafe.com/> (http://www.lazersafe.com/>),

[cid:image005.png@01D31FEB.80272120] < http://www.lazersafe.com/> (http://www.lazersafe.com/>);

[cid:image008.png@01D57CE9.7C452C70] [signature_1449061529]

From: ALI EVCI <ali.evci@ermaksan.com.tr<mailto:ali.evci@ermaksan.com.tr>>

Sent: Friday, October 4, 2019 5:14 PM

To: Mehmet Tatli <mehmet.tatli@lazersafe.com<mailto:mehmet.tatli@lazersafe.com>>

Cc: SERVICE <service@ermaksan.com.tr<mailto:service@ermaksan.com.tr> >

Subject: FW: Lazer safe PCSS com. error (I need help please!)

Hello Mr. Mehmet,

we are reading error 2209 on the PCSS display when we have the customer check the PCSS due to the Lazersafe communication error in a 2007 model Lazersafe machine. From what we understand from the condition codes, the error is "internal fault detected". Is there anything else that can be done other than changing the PCSS? The machine is in America.

Best Regards,

[signature]

From: mmen ard @international container co.com < mail to: mmen ard @international container co.com > [

<u>mailto:mmenard@internationalcontainerco.com (mailto:mmenard@internationalcontainerco.com)</u>]

Sent: Friday, October 04, 2019 5:05 PM

To: ALI EVCI

Subject: RE: Lazer safe PCSS com. error (I need help please!)

The code I am getting is 2209

Thank You

Mike

----Original Message----

From: "ALI EVCI" <ali.evci@ermaksan.com.tr<mailto:ali .evci@ermaksan.com.tr>>

Sent: Friday, October 4, 2019 9:45am

 $\label{to:mmenard} To: "mmenard@internationalcontainerco.com < mailto:mmenard@internationalcontainerco.com > " < mmenard@internationalcontainerco.com < mailto:mmenard@ internationalcontainerco.com > > " < mmenard@internationalcontainerco.com < mailto:mmenard@ internationalcontainerco.com > > " < mmenard@internationalcontainerco.com < mailto:mmenard@ internationalcontainerco.com < mailto:mmenard@$

Cc: "SERVICE" <service@ermaksan.com.tr<mailto:service@ermaksan.com.tr>>

Subject: RE: Lazer safe PCSS com. error (I need help please!)

This feature differs according to operating mode, key position, indexation, manual page, automatic page. So, i could not say an excat info on this. If you are in doubt about Lazersafe system, you can check the code appearing on Lazersafe PCSS unit inside electrical cabinet. And again I advise you to check the communication cable between CNC and Lazersafe unit.

Best Regards,

[signature]

From: mmenard@internationalcontainerco.com<mailto:mmenard@internationalcontainerco.com> [

mailto:mmenard@internationalcontainerco.com (mailto:mmenard@internationalcontainerco.com).

Sent: Friday, October 04, 2019 4:11 PM

To: ALI EVCI

Subject: RE: Lazer safe PCSS com. error (I need help please!)

The laser to the front light curtain is not on. should that be on right when the interface comes on or does it come on only when you press the test button and start?

Thank You

Mike

----Original Message----

From: "ALI EVCI" <ali.evci@ermaksan.com.tr<mailto:ali.evci@ermaksan.com.tr>>

Sent: Friday, October 4, 2019 1:54am

To: "mmenard@internationalcontainerco.com<mailto:mmenard@internationalcontainerco.com>"
<mmenard@internationalcontainerco.com<mailto:mmenard@internationalcontainerco.com>>
<mmenard@internationalcontainerco.com</mmenard@internationalcontainerco.com>>
<mmenard@internationalcontainerco.com>>
<mmenard@internati

 $\label{lem:cc: "SENOL RODOPLU" < s.rodoplu@ermakusa.com < mailto: s.rodoplu@ermakusa.com >> , "SERVICE" logoplu@ermakusa.com logoplu@erm$

<service@ermaksan.com.tr<mailto:service@ermaksan.com.tr>>, "AHMET MEKIK"

 $<\!ahmet.mekik@ermaksan.com.tr<\!mail\!to:\!ahmet.mekik@ermaksan.com.tr>>, "HULYA YILMAZ"$

<h.yilmaz@ermakusa.com<mailto:h.yilmaz@ermakusa.com>>

Subject: RE: Lazer safe PCSS com. error (I need help please!) Hello,

This error can be occured because of cable between controller and Lazersafe unit. It might me loosed.

Best Regards,

[imza]

From: HULYA YILMAZ

Sent: Thursday, October 03, 2019 5:54 PM To: UFUK KOCAEL; AHMET MEKIK; ALI EVCI

Cc: SENOL RODOPLU

Subject: FW: Lazer safe PCSS com. error (I need help please!)

Merhabalar,

Asagidaki sorunla ilgili yardimci olabilir misiniz?

Saygilarimla,

"Excellence in Fab Equipment Sales and Service"

 $[download] < \underline{http://www.ermakusa.com/usa/> (\underline{http://www.ermakusa.com/usa/>)};$

From: mmenard@internationalcontainerco.com<mailto:mmenard@internationalcontainerco.com> <mmenard@internationalcontainerco.com</p>

Sent: Thursday, October 3, 2019 9:43 AM

To: HULYA YILMAZ <h.yilmaz@ermakusa.com<mailto:h.yilmaz@ermakusa.com>>

Subject: Lazer safe PCSS com. error (I need help please!)

Good Morning,

I'm having an issue with my Ermak Pressbrake.

SN20071136

CNC SAP 12' X 220"

Brake ran fine this Morning and then the error message came up.

(D3156: LazerSafe PCSS communication error) Please, Can you give me some guidance on how to fix this issue?

Im under the gun here and I need this machine up and running ASAP.

Thank You For your assistance

Michael menard International Container Co. 110 North Bridge St., Holyoke, Mass 01089 P: 1-413-246-7503

Tue Oct 15 22:28:54 2019 The RT System itself - Outgoing email recorded

Tue Oct 15 22:28:54 2019 The RT System itself - Outgoing email recorded

Tue Oct 15 22:28:54 2019 <u>UMIT YILDIZ <umit.yildiz@ermaksan.com.tr></u> - Correspondence added

CC: YEDEK_PARCA <sparepart@ermaksan.com.tr>

Subject: RE: [rt.lazersafe.com.au #10894] FW: Lazer safe PCSS com. error (I need help please!)

Date: Tue, 15 Oct 2019 14:28:28 +0000

To: Mehmet Tatli <mehmet.tatli@lazersafe.com>, "Customer Service (Lazersafe)" <csresponder@lazersafe.com>

From: UMIT YILDIZ <umit.yildiz@ermaksan.com.tr>

Hello Mr. Mehmet;

Can you give me a shipping fee for the address below?

Best regards.

- Show quoted text -

Tue Oct 15 14:49:18 2019 The RT System itself - Outgoing email recorded Case 3:23-cv-30016-MGM Document 108-1 Filed 11/26/25 Page 72 of 189

Tue Oct 15 14:49:18 2019 mehmet (Mehmet Tatli) - Correspondence added

CC: YEDEK_PARCA <sparepart@ermaksan.com.tr>

Subject: RE: [rt.lazersafe.com.au #10894] FW: Lazer safe PCSS com. error (I need help please!)
Date: Tue, 15 Oct 2019 14:48:21 +0800

To: UMIT YILDIZ <umit.yildiz@ermaksan.com.tr>, "Customer Service (Lazersafe)" <csresponder@lazersafe.com>

From: Mehmet Tatli <mehmet.tatli@lazersafe.com>

Hello Mr. Umit,

Since it is a product that is only sold as a spare part and is planned to be discontinued next year, the prices are unfortunately high as you said.

You can make the connection conversion from the old generation PCSS-F1 to the new generation PCSS-A1. Currently, there is an electrical project and PCSS program at Ermaksan for the PCSS-A1 + Delemli machine, this work can be done through it, but at this stage, the cables will need to be removed from F1 and connected to A1 one by one.

According to the ECP in the attachment, the production of the old generation PCSS'Fx will be finished as of the beginning of next year, so such conversion projects will need to be done in any case. This is difficult at this stage, but our suggestion for the future is to prepare a ready-made cable kit with sockets/connectors for the conversion and make the job easier.

Regards

Mehmet TATLI
Customer Service

Lazer Safe Pty Ltd 27 Action Road Malaga, WA 6090 Australia T +61 8 9249 4388 F +61 8 9249 6011 M +90 532 566 6879 E mehmet.tatli@lazersafe.com

Follow Us:

- Show quoted text -

Message body not shown because it is not plain text.

Tue Oct 15 14:32:51 2019 The RT System itself - Outgoing email recorded

Tue Oct 15 14:32:51 2019 The RT System itself - Outgoing email recorded

Tue Oct 15 14:32:51 2019 <u>UMIT YILDIZ <umit.yildiz@ermaksan.com.tr></u> - Correspondence added

CC: YEDEK_PARCA <sparepart@ermaksan.com.tr>

Subject: RE: [rt.lazersafe.com.au #10894] FW: Lazer safe PCSS com. error (I need help please!)

Date: Tue, 15 Oct 2019 06:31:29 +0000

To: Mehmet Tatli <mehmet.tatli@lazersafe.com>, "Customer Service (Lazersafe)" <csresponder@lazersafe.com>

From: UMIT YILDIZ <umit.yildiz@ermaksan.com.tr>

Hello Mr. Mehmet;

Thank you for your offer, but the product price is too expensive. Can't you provide a link to the current product instead? Can you provide information?

Best regards.

- Show quoted text -

Tue Oct 15 14:12:09 2019 The RT System itself - Outgoing email recorded

Tue Oct 15 14:12:09 2019 The RT System itself - Outgoing email recorded

Document 108-1 Filed 11/26/25 Case 3:23-cv-30016-MGM
Tue Oct 15 14:12:08 2019

ALI EVCI <ali.evci@erm Page 73 of 189

ALI EVCI <ali.evci@ermaksan.com.tr> - Correspondence added

cc: "Mehmet Tatli via RT <customerservice@lazersafe.com.au> (customerservice@lazersafe.com.au)" <customerservice@lazersafe.com.au>, SERVICE <service@ermaksan.com.tr>

Subject: FW: [rt.lazersafe.com.au #10894] FW: Lazer safe PCSS com. error (I need help please!)

Date: Tue, 15 Oct 2019 06:11:33 +0000

To: UFUK KOCAEL <ufuk.kocael@ermakusa.com>

From: ALI EVCI <ali.evci@ermaksan.com.tr>

Hello Ufuk Abi,

We will order Lazersafe PCSS-F for the 2007 model machine that has a Lazersafe shortage in America, but we need its program. We do not have the program records for this machine. Can you do or have someone do what Mehmet Bey said below? This way we can see the name of the program in the PCSS and upload it to the new one.

Best Regards,

- Show quoted text -

Tue Oct 15 14:01:43 2019 The RT System itself - Outgoing email recorded

Tue Oct 15 14:01:43 2019 mehmet (Mehmet Tatli) - Correspondence added

Subject: RE: [rt.lazersafe.com.au #10894] FW: Lazer safe PCSS com. error (I need help please!)

Date: Tue, 15 Oct 2019 14:01:36 +0800

To: "Customer Service (Lazersafe)" <csresponder@lazersafe.com>

From: Mehmet Tatli <mehmet.tatli@lazersafe.com>

Good morning Mr. Ali,

Is there anyone in the US who can try to install kernel and isagraph on the faulty PCSS?

Regards

Mehmet TATLI

Customer Service

Lazer Safe Pty Ltd

27 Action Road

Malaga, WA 6090

Australia

T +61 8 9249 4388

F +61 8 9249 6011

M +90 532 566 6879

E mehmet.tatli@lazersafe.com

Follow Us:

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Tue Oct 15 13:42:56 2019 The RT System itself - Outgoing email recorded

Tue Oct 15 13:42:56 2019 The RT System itself - Outgoing email recorded Case 3:23-cv-30016-MGM Document 108-1 Filed 11/26/25 Page 74 of 189

Tue Oct 15 13:42:54 2019 ALI EVCI <ali.evci@ermaksan.com.tr> - Correspondence added

CC: SERVICE <service@ermaksan.com.tr>, UMIT YILDIZ <umit.yildiz@ermaksan.com.tr>

Subject: RE: [rt.lazersafe.com.au #10894] FW: Lazer safe PCSS com. error (I need help please!)

Date: Tue, 15 Oct 2019 05:41:25 +0000

To: "customerservice@lazersafe.com.au" < customerservice@lazersafe.com.au>

From: ALI EVCI <ali.evci@ermaksan.com.tr>

Hello Mr. Mehmet,

Since we will direct the order to the address directly, we prefer the upload and shipment, but we need your help with the program because we do not have the installed program in our records. Can you help me find it? I am attaching the PCSS photo on the machine, the machine parameters and the project.

Possible shipping address;

ErmakUSA Inc.

2860 S River Rd, Suite 145, Des Plaines,**I**L 60018 USA

Best Regards,

- Show quoted text -

Image not shown because sender requested not to inline it.

Message body not shown because it is not plain text.

Message body not shown because it is not plain text.

Tue Oct 15 00:07:20 2019 The RT System itself - Outgoing email recorded

V-30016-MGM Document 108-1 mehmet (Mehmet Tatli) - Correspondence added Case 3:23-cv-30016-MGM Page 75 of 189

CC: UMIT YILDIZ <umit.yildiz@ermaksan.com.tr>, SPARE_PARTS <sparepart@ermaksan.com.tr>

Subject: RE: [rt.lazersafe.com.au #10894] FW: Lazer safe PCSS com. error (I need help please!)

Date: Tue, 15 Oct 2019 00:07:14 +0800

To: "Customer Service (Lazersafe)" <csresponder@lazersafe.com>

From: Mehmet Tatli <mehmet.tatli@lazersafe.com>

Hello Ümit,

1, The order code, description and price information for the product you have requested are as follows;

0013000700 --- PCSS-F IO01 w/Guard Counter 1 --- 3378.00 EURO

2, Do you know the name of the Isagraf Application (PCSS program) on the faulty PCSS? Who will load the program to the PCSS? If Lazer Safe will do it, a copy of the program (.pia format) needs to be sent with the order. The order code, description and fee for the loading fee are as follows;

ISAGRAF001 --- IsaGRAF loading charge --- 135.00 EURO

3, If you specify the address where the product will be sent, I can ask for a price, but as we have stated before, the actual price of the product will appear on the invoice, just so you know.

Regards

Mehmet TATLI

Customer Service

Lazer Safe Pty Ltd 27 Action Road Malaga, WA 6090 Australia

T +61 8 9249 4388

F +61 8 9249 6011

M +90 532 566 6879

E mehmet.tatli@lazersafe.com

Follow Us:

From: UMIT YILDIZ <umit.yildiz@ermaksan.com.tr>

Sent: Monday, October 14, 2019 3:47 PM

To: Mehmet Tatli <mehmet.tatli@lazersafe.com> Cc: YEDEK_PARCA <sparepart@ermaksan.com.tr>

Subject: FW: Lazer safe PCSS com. error (I need help please!)

Hello Mehmet;

Can you send me an offer for the attached PCSS? The product is going to America. If possible, please send me the shipping cost.

Best regards.

- Show quoted text -

Mon Oct 07 18:34:15 2019 The RT System itself - Outgoing email recorded

Mon Oct 07 18:34:15 2019 The RT System itself - Outgoing email recorded

Mon Oct 07 18:34:15 2019 <u>ALI EVCI <ali.evci@ermaksan.com.tr></u> - Correspondence added

CC: SERVICE <service@ermaksan.com.tr>

Subject: RE: [rt.lazersafe.com.au #10894] FW: Lazer safe PCSS com. error (I need help please!)

Date: Mon, 7 Oct 2019 10:33:33 +0000

To: "customerservice@lazersafe.com.au" < customerservice@lazersafe.com.au>

From: ALI EVCI <ali.evci@ermaksan.com.tr>

Hello Mr. Mehmet,

Thank you. For this topic, I will suggest the customer to send the PCSS for repair or replace it with a new one. You can close the topic.

Best Regards,

- Show quoted text -

Case 3:23-cv-30016-MGM Document 108-1 Filed 11/26/25

Mon Oct 07 17:11:42 2019 The RT System itself - Outgoing email recorded Page 76 of 189

Mon Oct 07 17:11:42 2019

The RT System itself - Status changed from 'new' to 'open'

Mon Oct 07 17:11:41 2019

mehmet (Mehmet Tatli) - Correspondence added

Subject: RE: [rt.lazersafe.com.au #10894] FW: Lazer safe PCSS com. error (I need help please!)

Date: Mon, 7 Oct 2019 17:10:45 +0800

To: "Customer Service (Lazersafe)" <csresponder@lazersafe.com>

From: Mehmet Tatli <mehmet.tatli@lazersafe.com>

Hello Mr. Ali,

Thanks for your email.

According to the attached code description, it seems like the only and last thing you can do is to try to update the kernel software.

As far as I understand from the photos, the protection system is LZS-004 HS(Cift Laser), so you can try to install the attached kernel version(Fx17700).

If it doesn't work, PCSS needs to be repaired(there is no guarantee that it can be repaired) or replaced with a new one.

In any case, I hope there is a record of the Isagraf application name(PCSS program).

Regards Mehmet TATLI

Customer Service

Lazer Safe Pty Ltd 27 Action Road Malaga, WA 6090 Australia T +61 8 9249 4388 F +61 8 9249 6011

M +90 532 566 6879

E mehmet.tatli@lazersafe.com

Follow Us:

- Show quoted text -

Message body not shown because it is not plain text.

Message body not shown because it is not plain text.

Mon Oct 07 16:58:37 2019 Mehmet Tatli - Queue changed from General to Ermaksan

Mon Oct 07 16:58:37 2019 mehmet (Mehmet Tatli) - Category PCSS added

Mon Oct 07 16:58:37 2019 mehmett (Mehmet Tatli) - Requestor < service@ermaksan.com.tr> added

Mon Oct 07 16:58:13 2019 mehmet (Mehmet Tatli) - Taken

Mon Oct 07 16:56:24 2019 The RT System itself - Outgoing email recorded

Mon Oct 07 16:56:24 2019 The RT System itself - Outgoing email recorded Case 3:23-cv-30016-MGM Document 108-1 Filed 11/26/25 Page 77 of 189 Mon Oct 07 16:56:24 2019 ALL EVCI ALL EVCI aLL EVCI aLL EVCI

cc: SERVICE <service@ermaksan.com.tr>

Subject: FW: Lazer safe PCSS com. error (I need help please!)

Date: Mon, 7 Oct 2019 08:55:17 +0000

To: "Mehmet Tatli via RT <customerservice@lazersafe.com.au> (customerservice@lazersafe.com.au)" <customerservice@lazersafe.com.au> From: ALI EVCI <ali.evci@ermaksan.com.tr>

Hello

Communication error appears at one of our 2007 pressbrake with Lazersafe PCSS and the code on PCSS dsplay is 2209. As far as we understand from the condition codes, this is "internal fault detected "error. Is there anything else that can be done other than replacing PCSS? The machine is in America.

Best Regards,



From: Mehmet Tatli [mailto:mehmet.tatli@lazersafe.com]

Sent: Monday, October 07, 2019 8:31 AM

To: ALI EVCI Cc: SERVICE

Subject: RE: Lazer safe PCSS com. error (I need help please!)

Good morning Mr. Ali,

I ask you to send the email to customerservice@lazersafe.com) (mailto:customerservice@lazersafe.com)

Regards

Mehmet SWEET

Customer Service

Lazer Safe Pty Ltd T +61 8 9249 4388 Follow Us:

27 Action Road F +61 8 9249 6011

Malaga, WA 6090 M +90 532 566 6879

(http://www.linkedin.com/company/lazersafe-pty-ltd) 🔠 (mailto:mehmet.tatli@lazersafe.com) Austra**l**ia

(https://twitter.com/lazersafe) [

Performance without compromise." (http://www.lazersafe.com/) lazersafe.com

(http://www.lazersafe.com/)



Visit us at the Lazer Safe stand

Stand A4188 & A4191

11 – 14 November 2019 - Chicago, USA

From: ALI EVCI < ali.evci@ermaksan.com.tr (mailto:ali.evci@ermaksan.com.tr) >

Sent: Friday, October 4, 2019 5:14 PM

To: Mehmet Tatli < mehmet.tatli@lazersafe.com (mailto:mehmet.tatli@lazersafe.com) >

Cc: SERVICE < service@ermaksan.com.tr (mailto:service@ermaksan.com.tr) >

Subject: FW: Lazer safe PCSS com. error (I need help please!)

Hello Mr. Mehmet,

When we have the customer check the PCSS on a Lazersafe communication error in a 2007 model Lazersafe machine, we read the 2209 error on the PCSS display. As far as we understand from the condition codes, the error is "internal fault detected". Is there anything else that can be done other than changing the PCSS? The machine is in America.

Best Regards,



From: <u>mmenard@internationalcontainerco.com</u>)
[mailto:mmenard@internationalcontainerco.com)
[mailto:mmenard@internationalcontainerco.com)

Sent: Friday, October 04, 2019 5:05 PM

To: ALI EVCI

Subject: RE: Lazer safe PCSS com. error (I need help please!)

The code I am getting is 2209

Thank You

Mike

----Original Message-----

From: "ALI EVCI" <ali_evci@ermaksan_com_tr (mailto:ali_evci@ermaksan_com_tr) >

Sent: Friday, October 4, 2019 9:45am

To: "mmenard@internationalcontainerco.com (mailto:mmenard@internationalcontainerco.com) " <mmenard@internationalcontainerco.com (mailto:mmenard@internationalcontainerco.com) >

Cc: "SERVICE" <<u>service@ermaksan.com.tr (mailto:service@ermaksan.com.tr)</u> >

 ${\it Subject: RE: Lazer \ safe \ PCSS \ com. \ error \ (\ I\ need \ help \ please!)}$

This feature differs according to operating mode, key position, indexation, manual page, automatic page. So, i could not say an excat info on this. If, you are doubt about Lazersafe system, you can check the code appearing on Lazersafe PCSS unit inside electrical cabinet. And again i advise you to check the communication cable between CNC and Lazersafe unit.

Best Regards,



From: mmenard@internationalcontainerco.com (mailto:mmenard@internationalcontainerco.com) $[\underline{\textit{mailto:} mmenard@internationalcontainerco_com_(\underline{\textit{mailto:} mmenard@internationalcontainerco_com})}]$

Sent: Friday, October 04, 2019 4:11 PM

To: ALI EVCI

Subject: RE: Lazer safe PCSS com. error (I need help please!)

The laser to the front light curtain is not on, should that be on right when the interface comes on or does it come on only when you press the test button and start?

Thank You

Mike

----Original Message-

From: "ALI EVCI" < ali.evci@ermaksan.com.tr (mailto:ali.evci@ermaksan.com.tr) >

Sent: Friday, October 4, 2019 1:54am

To: "mmenard@internationalcontainerco.com (mailto:mmenard@internationalcontainerco.com) " <mmenard@internationalcontainerco.com (mailto:mmenard@internationalcontainerco.com) >

 $\label{eq:complex} \textbf{Cc: "SENOL RODOPLU"} < \underbrace{\textbf{s.rodoplu@ermakusa.com (mailto:s.rodoplu@ermakusa.com)}}_{}, "SERVICE" < \underbrace{\textbf{service@ermaksan.com.tr}}_{}$ (mailto:service@ermaksan.com.tr) >, "AHMET MEKIK" <ahmet.mekik@ermaksan.com.tr (mailto:ahmet.mekik@ermaksan.com.tr). >, "HULYA YILMAZ" < h.yilmaz@ermakusa.com (mailto:h.yilmaz@ermakusa.com) >

Subject: RE: Lazer safe PCSS com. error (I need help please!)

Hello,

This error can be occured because of cable between controller and Lazersafe unit. It might me loosed.

Best Regards,



From: HULYA YILMAZ

Sent: Thursday, October 03, 2019 5:54 PM To: UFUK KOCAEL; AHMET MEKIK; ALI EVCI

Cc: SENOL RODOPLU

Subject: FW: Lazer safe PCSS com. error (I need help please!)

Hello

Can you help me with the following issue?

Saygilarimla

"Excellence in Fab Equipment Sales and Service"



Hulya Yilmaz Marketing Associate

ErmakUSA Inc. 2860 River Road, Suite 145, Des Plaines, IL 60018 / USA P:+1 847 640-7765 h.yilmaz@ermakusa.com | ermakusa.com



(http://www.ermakusa.com/usa/)

From: mmenard@internationalcontainerco.com (mailto:mmenard@internationalcontainerco.com) <mmenard@internationalcontainerco.com (mailto:mmenard@internationalcontainerco.com) >

Sent: Thursday, October 3, 2019 9:43 AM

To: HULYA YILMAZ < h.yilmaz@ermakusa.com (mailto:h.yilmaz@ermakusa.com) >

Subject: Lazer safe PCSS com. error (I need help please!)

Good Morning,

I'm having an issue with my Ermak Pressbrake.

SN20071136

CNC SAP 12' X 220"

Brake ran fine this Morning and then the error message came up.

(D3156 : LazerSafe PCSS communication error)

Please, Can you give me some guidance on how to fix this issue?

Im under the gun here and I need this machine up and running ASAP.

Thank You For your assistance

Michael menard

International Container Co.

110 North Bridge St., Holyoke , Mass 01089

P: 1-413-246-7503

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Image displayed inline above
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Image not shown because sender requested not to inline it

EXHIBIT D

VOLUME: I PAGES: 1 - 47

EXHIBITS: See Index

UNITED STATES DISTRICT COURT

DISTRICT OF MASSACHUSETTS

C.A. No. 3:23-CV-30016

IVAN LAGUNA and MARGARITA LOPEZ,

Plaintiffs

v.

LAZER SAFE, PTY, LTD.; FIESSLER

ELECTRONIK GmbH & CO., KG; ERMAK USA;

INC.; ERMAKSAN TURKEY a/k/a ERMAKSAN

MAKINA SANAYIVE TICARET A.S.; and JOHN

DOE DISTRIBUTOR,

Defendants

- - - - - - - - - - x

VIDEOTAPED ZOOM VIDEOCONFERENCE DEPOSITION OF THCO LLC BY JEFFREY G. TANNEHILL, a witness called on behalf of the Plaintiffs pursuant to the Federal Rules of Civil Procedure before Jessica L. Williamson, Registered Merit Reporter, Certified Realtime Reporter, and Notary Public in and for the Commonwealth of Massachusetts, on Wednesday, January 15, 2025, commencing at 10:05 a.m.

LONDON STENOGRAPHY LLC
P.O. Box 155
Manomet, Massachusetts 02345
londonreporter@comcast.net
774.259.0646

Page 2

```
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 1
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     Michael J. Mascis, Esq.
 3
     Sullivan & Sullivan, LLP
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     83 Walnut Street
 5
     Wellesley, Massachusetts 02481
 6
 7
     (781) 263-9400
 8
     mmascis@sullivanllp.com
     Counsel for the Plaintiffs
 9
10
     Sean M. Sharp, Esq.
11
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     Atom Law Group
13
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     Suite 700
14
     Chicago, Illinois 60654
15
16
     (312) 943-8000
17
     ssharp@atom.law
18
     Counsel for the Defendants Ermak USA, Inc.
19
     and Ermaksan Turkey a/k/a Ermaksan Makina
20
     Sanayi Ve Ticaret A.S.
21
22
23
24
```

Page 3

```
A P P E A R A N C E S, Continued
 1
 2
     Patricia E. Antezana, Esq.
 3
     Reed Smith, LLP
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     Reed Smith Center
 5
     225 Fifth Avenue, Suite 1200
 6
 7
     Pittsburgh, Pennsylvania 15222
     (412) 288-7242
 8
     pantezana@reedsmith.com
 9
     Counsel for the Defendant Fiessler
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11
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16
     Lynnfield, Massachusetts 01940
17
     (718) 309-1503
     adukonis@litchfieldcavo.com
18
     Counsel for the Defendant Lazer Safe Pty.
19
     Ltd.
20
21
22
     ALSO PRESENT:
     Adam Cerro, Videographer
23
24
```

```
Α.
          No, sir.
 1
 2
          Okay. Let me pull down Exhibit 1. Let
     Q.
          me just -- I'm just going to show you
 3
          another exhibit.
 4
                   MR. MASCIS: We'll mark this as
 5
          Exhibit 2.
 6
               (Exhibit No. 2, Screen Capture of THCO
 7
          LLC Website, marked for identification.)
 8
          And this I'll suggest to you is a screen
 9
     Q.
          capture from your website.
10
               (Screen sharing.)
11
12
     Α.
          Yes, sir.
13
          And is this something that you wrote, or
     Ο.
          did -- do you know who prepared this
14
          website?
15
16
     Α.
          That would have been me, sir.
          Okay. And I see that on this Exhibit 2 you
17
     Q.
          describe THCO LLC as "the appointed Master
18
          Distributor and Authorised Spare Parts
19
          Stockist for Lazer Safe retrofit press brake
20
          guarding systems"?
21
          Yes, sir.
22
     Α.
23
          Okay. And I see there's a logo for Lazer
     Ο.
          Safe in the upper right corner. Is that
24
```

something that you were provided by Lazer

Safe?

- A. I can't really answer that, sir. That is

 Lazer Safe's logo most certainly, but

 whether it was provided by Lazer Safe, I

 assume it would have been because we did not

 produce that.
- And, yeah, I know you mentioned this 8 Q. earlier, but I'm looking at that first 9 sentence -- I'll blow it up a little. 10 kind of small, but -- which states "Over the 11 12 past 10 years, we have supplied and installed over one thousand Lazer Safe 13 retrofit systems on a wide-range of various 14 makes and models of press brakes." 15

And so I guess my question is do

you -- does this -- is this accurate as far

as the installation aspect of it?

- A. No. I would say simply the 10-year would actually be more like a 15-year mark --
- 21 | O. Okay. And --

3

4

5

6

7

16

17

18

19

20

- 22 A. -- at this point in time.
- Q. Okay. In the wide range of makes and models of press brakes, does that include Lazer

EXHIBIT E

UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

NO. 3:23-CV-30016

- - - - - - - - - - - - - - - x

v.

Lazer Safe, Pty, Ltd, Fiessler

Elektronik GmbH & Co., KG., Ermak

USA, Inc., Ermaksan Turkey, aka

Ermaksan Makina Sanayi Ve Ticaret

A.S., and John Doe Distributor, VOLUME 1

Defendants. PAGES 1-61

- - - - - - - - - - - x

RULE 30(b)(6) AUDIOVISUAL DEPOSITION TAKEN VIA ZOOM

OF LAZER SAFE PTY LTD,

by and through its designee, PAUL SERTIS

Tuesday, April 8, 2025 at 7:00 p.m.

Reporter: Lori-Ann London, RPR, Mass. CSR #153020

LONDON STENOGRAPHY LLC
P.O. Box 155
Manomet, MA 02345
774.259.0646
londonreporter@comcast.net

```
REMOTE APPEARANCES OF COUNSEL
 1
 2
      (All parties present from their respective
 3
      locations via Zoom videoconferencing)
 4
 5
      On Behalf of the Plaintiff:
 6
          SULLIVAN & SULLIVAN, LLP
 7
          83 Walnut Street
 8
          Wellesley, Massachusetts 02481
 9
          781.263.9400
10
          By: MICHAEL J. MASCIS, ESQUIRE
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               mmascis@sullivanllp.com
12
13
      On Behalf of Defendant Lazer Safe Pty. Ltd.:
14
15
          LITCHFIELD CAVO
16
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          Lynnfield, Massachusetts 01940
17
          781.309.1500
18
          By: NORA ADUKONIS, ESQUIRE
19
               adukonis@litchfieldcavo.com
20
21
22
23
24
      (Continued)
```

Page 3

```
REMOTE APPEARANCES OF COUNSEL (Continued)
 1
 2
      On Behalf of Defendants Fiessler Elektronik GmbH:
 3
          REED SMITH
 4
          225 Fifth Avenue, Suite 1200
 5
          Pittsburgh, Pennsylvania 15222
 6
          412.288.7242
 7
          By: PATRICIA ANTEZANA, ESQUIRE
 8
 9
               pantezana@reedsmith.com
10
      On Behalf of Defendants Ermak USA, Inc. and
11
12
      Ermaksan Turkey:
          ATOM LAW GROUP
13
          770 N LaSalle Street, Suite 700
14
          Chicago, Illinois 60654
15
16
          312.943.8000
17
          By: SEAN M. SHARP, ESQUIRE
               ssharp@atom.law
18
19
20
      ALSO PRESENT:
21
          Adam Cerro, Legal Video Specialist
22
23
24
```

I don't believe that there is a Α 1 2 requirement that we do. Do you -- as far as the chart that 3 Q appears in this document, Exhibit 2, on page --4 it's page -- I'm gonna get this thing down here --5 it's page 13, are you familiar with this chart that 6 7 we're looking at here on page 13 of Exhibit 2? Α Yes. 8 And what is this? 9 Q So this is a location report that was run 10 from Google Analytics 4, and this shows 11 IP addresses from Massachusetts that visited the 12 Lazer Safe website during the time period listed in 13 the top right-hand corner of the document. 14 And let's see if I can move it over a 15 16 little. This time frame that we're looking at 17 is just May of -- May of 2023 to August of 2024. 18 Is that right? 19 Yes. 20 Α And the -- the chart that you -- you had 21 shown here, is that something that you just request 22 23 a report from Google Analytics and they produce it for you? 24

A Yes.

Q And how long has Lazer Safe been -- been using Google Analytics as part of its -- its sales and marketing?

A I don't remember exactly.

Q What -- could you describe for us, what does Google Analytics do for Lazer Safe?

A We don't use it frequently. We look at it occasionally to see where website traffic is coming from, usually just to a country label, we don't normally look any further than that, just to gauge a general idea of, you know, which -- which -- well, you know, which countries are -- are viewing our website.

Q And does the -- does the Google Analytics describe whether anybody logs into your website in any manner?

A No.

Q I'm looking at this graph where it talks about -- underneath the -- where it says -- midway through it says "Massachusetts region," and then here it's -- let me use my cursor if I can circle it, if you can see that, it says "engaged session." Do you know what that's referring to?

Α No. 1 2 Or what is the "engagement rate" that's here? Do you know what that refers to? 3 4 Α No. Does Google provide you with any type of 5 manuals to decipher these graphs? 6 Not manuals, but I have information 7 Α online. 8 Okay. And a chart like this, would you 9 0 be able to contact Google and get more detailed 10 information from them based upon what type of 11 12 interactions the users are having with the website? MS. ADUKONIS: Objection. 13 You can answer. 14 If you want specifically to know what 15 16 engaged sessions and engagement rights refer to, then, yes, I could get that information. 17 Does -- does the -- Lazer Safe's website 18 19 have areas where users can log in to get certain content? 20 21 Α Yes. And if -- does the website also have 22 Q links to social media for Lazer Safe? 23 24 Α Yes.

And was the website up and running back 1 2 in the time period of 2018 to 2020, for Lazer Safe? MS. ADUKONIS: Objection. 3 You can answer. 4 Yes. 5 Α But as far as information such as we're 6 7 looking at here in Exhibit 2 on page 13, there's no -- you haven't preserved any of the da -- any of 8 the data from that time period of 2018 to 2020. Is 9 that right? 10 11 Α No. 12 Q Does -- would Google Analytics have a separate storage system where they -- they may have 13 recorded IP addresses that interact with the Lazer 14 Safe website from that time period, 2018 to 2020? 15 MS. ADUKONIS: Objection. 16 17 You can answer. No, they wouldn't. That data's not 18 Α available. The reason being that anything up until 19 I believe it's September 2000 -- I'm sorry --20 21 May 2023 Google switched to a new analytics platform called Google Analytics 4, and at some 22 23 point any historical data before that date was -was removed and is no longer accessible. 24

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So as you -- as we sit here today, is there any -- any -- any data that's been stored that would tell us the IP addresses of people from Massachusetts who interacted with the Lazer Safe website in the time period of -- of 2018 to 2020? Lazer Safe doesn't have that data in storage. 0 And other than Google Analytics, would there be any other place that you could look to fi -- to see if those IP addresses might have been preserved somewhere? Α No, not that I'm aware of. In general terms, the website -- in the Q time period 2018 to 2020, would you agree with me that the website had an advertising component to it? Not necessarily. The website itself Α doesn't have advertising. Well, when you -- it does -- it does con -- or it did back then, as it does today, does it contain information about Lazer Safe and its products? Yes, it does. In terms of advertising,

though -- so the website doesn't have advertising

itself. We do run, on occasion, advertisements 1 2 through Google Ads that would then link -- be able to click on those ads would then link back through 3 to the Lazer Safe website. 4 But a -- a user 2018 could access the 5 Lazer Safe website and learn about light laser --6 laser safety -- safety equipment for press brake 7 machines, correct? 8 MS. ADUKONIS: Objection. 9 You can answer. 10 If it was in 2018, I would have to go and 11 12 check, check to verify what type of advertising we had running at the time, but that's something I 13 could certainly check. 14 But without -- without getting hung up on 15 16 the word "advertising," you'd agree with me that the -- the Lazer Safe website contains information 17 for an I -- someone at an IP address to access 18 19 information about safety equipment manufactured by Lazer Safe for press brake machines? 20 MS. ADUKONIS: Objection. 21 You can answer. 22 2018 -- well, yes, in 2018, we did have 23 Α

product information on the website that people

24

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could come to the website and view.
 1
                Let's take a look at another exhibit
 2
      here. I'm taking down Exhibit 2.
 3
                    (Exhibit 19 marked for
 4
                    identification.)
 5
                    (Screen sharing.)
 6
 7
                Okay, I'm gonna show you a document I've
      marked -- premarked as Exhibit 19. And this is a
 8
      nine-page document, which basically I can represent
9
      were screen-grabs from the Lazer Safe website, but
10
      looking at that first page, does that look familiar
11
12
      to you?
                Part of it does. The graphic styling
13
           Α
      looks a little odd --
14
                It's been copied a few times.
15
16
                -- as if it's been cut and paste.
           Α
17
           Q
                Yeah.
                It doesn't look like original.
18
           Α
19
           Q
                Okay.
                But the copy, the written copy, does look
20
           Α
      familiar.
21
                Okay. And then if we go to the -- I'll
22
           Q
      just go on to the next page. Page 2 of Exhibit 19,
23
      does that look like it's -- it's part of the Lazer
24
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Safe website? I can blow it up some more.
 1
 2
                No. This -- some of this content appears
 3
      to have been cut and paste from one of our product
      brochures.
 4
 5
           Q Okay.
                The product brochure may have been
 6
 7
      available --
                    THE STENOGRAPHER: Froze?
 8
           Q
                Okay. Would you have been involved in --
 9
                    THE STENOGRAPHER: Sorry. I didn't
10
      -- he looks frozen. I don't -- I didn't get the
11
12
      whole answer, I don't think.
                    MS. ADUKONIS: Yeah, he seems frozen.
13
                    MR. MASCIS: I'm sorry, what was
14
      that?
15
16
                    THE STENOGRAPHER: I didn't get the
      whole answer. I think he's frozen.
17
                    MR. MASCIS: Oh --
18
                    THE STENOGRAPHER: Well, I did get,
19
      "The product brochure may have been available," if
20
      that was the whole answer, but I think he is
21
      frozen.
22
                    THE VIDEOGRAPHER: Should we go off
23
      the record?
24
```

MR. MASCIS: Yeah. 1 2 THE VIDEOGRAPHER: The time is 7:31 p.m., we're off the record. 3 (Off record.) 4 THE VIDEOGRAPHER: The time is 5 7:33 p.m., we're on the record. 6 7 BY MR. MASCIS: Q Mr. Sertis, I'm just -- we're looking at 8 Exhibit 19, even though we're having some technical 9 difficulties with the Zoom link, but Exhibit 19, do 10 you recognize this document, what I've shown you so 11 12 far, as far as a Lazer Safe website or brochure I 13 think you called it? I recognize the content, but the document 14 itself is not a Lazer Safe document. It appears to 15 16 be content cut and paste from a Lazer Safe product brochure. 17 18 Q Okay. And that -- that brochure may have been 19 on the website as a download. 20 Okay. So is that part of your duties, 21 to -- do you develop the brochures for Lazer Safe? 22 Α Yes. 23 And those brochures are -- are designed 24 Q

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to ultimately promote Lazer Safe and sell its
 1
 2
      products. Is that right?
 3
           Α
                Yes.
                Did -- as far as the -- the -- the
 4
      products that Lazer Safe sells, part of the
 5
      products are -- are safety equipment for press
 6
      brake machines. Is that correct?
 7
           Α
                Yes.
 8
                Did -- and are you involved in developing
 9
      markets for those safety systems?
10
                Yes.
11
           Α
12
           Q
                All right. Let's take a look at another
      exhibit, and I think -- okay. Let me stop sharing
13
      for a second. I'll try and pull it up here.
14
                    I'm going to show you what I've
15
16
      marked as Exhibit 9.
                    (Exhibit 9 marked for
17
                    identification.)
18
19
                    (Screen sharing.)
                And this is a photograph of the machine
20
      at issue in our case that -- and it's a photograph
21
      that was taken in Massachusetts of the -- and this
22
      is -- I can represent is a photo that was attached
23
      to the Ermaksan press brake machine at issue in the
24
```

```
1
      case.
 2
                    Do you recognize what's shown in this
      document?
 3
 4
           Α
                Yes.
                What is it?
 5
           Q
                It's showing the -- the backside and
 6
      label of a Lazer Safe receiver.
 7
                Okay. And there's a -- I'll show you
 8
      another document related to that, which is called a
 9
      "transmitter," but let me pull that one up.
10
                    (Exhibit 10 marked for
11
12
                    identification.)
                Let me show you -- we've marked this as
13
      Exhibit 10.
14
                    (Screen sharing.)
15
16
                Do you recognize what's shown in
      Exhibit 10?
17
                Yes.
18
           Α
                What is that?
19
                That's the backside and label of a Lazer
20
      Safe transmitter.
21
                And can you first -- for us laypeople,
22
           0
      can you describe, do the trans -- does the
23
24
      transmitter that we see in Exhibit 10 here, and the
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receiver that we showed in Exhibit 9, do they
 1
 2
      interact as part of the Lazer Safe guarding system?
           Α
 3
                Yes.
                    MS. ADUKONIS: Objection.
 4
                    You can answer. Sorry.
 5
                Okay. And then so -- and have you
 6
 7
      done -- have you reviewed documents as to these
      particular units and how they ended up on the
 8
      subject press brake machine?
 9
                Can you explain further?
10
                Go ahead.
11
           Q
12
                Oh, so you just clarify the question
      you're asking.
13
                Oh. Do you know when these -- these
14
      units were sold to become part -- as component
15
16
      parts of the Ermaksan press brake machine?
                    MS. ADUKONIS: Objection.
17
                    You can answer, if you know.
18
19
           Α
                No.
                Were -- were you employed at Lazer Safe
20
           Q
      in 2009?
21
           Α
                Yes.
22
                Are you -- are you -- earlier we talked
23
           Q
      about Mr. Tatli and -- and his role at Lazer Safe.
24
```

Would his job duties -- could you describe what his 1 job duties are for Lazer Safe? 2 Yes. So, as I mentioned before, he's a 3 integration engineer. So he primarily works with 4 our OEM customers who are press brake manufacturers 5 to assist in the custom integration of our products 6 7 into the manufacturer's machines. Q And does he actually perform service to 8 Lazer Safe customers? 9 MS. ADUKONIS: Objection. 10 You can answer. 11 12 Α Could you please clarify what you mean by service? 13 I mean does he travel -- do part of his 14 duties include traveling to assist customers of 15 Lazer Safe who need his assistance in repairs or 16 maintenance? 17 18 MS. ADUKONIS: Objection. 19 Α No, generally he doesn't do that. Okay. Go ahead. 20 Q 21 Α He would -- sorry. Let me just ask you one more question. 22 Q Does he consult with people -- is he 23 a resource for people who need his assistance in 24

diagnosing issues related to Lazer Safe products? 1 2 MS. ADUKONIS: Objection. 3 You can answer. He provides technical support to our Α 4 customers, it's generally via email. Just to 5 clarify further, he does visit customers to assist 6 with product integration. But in terms of your 7 question regarding does he visit customers to 8 service equipment, generally he doesn't perform 9 that duty. 10 But if, like in this instance, we were --11 12 are you familiar with there were some email exchanges between Ermaksan and -- and Mr. Tatli 13 regarding Lazer Safe equipment on the press brake 14 machine? 15 16 Α Yes. And you yourself weren't -- don't --17 Q weren't involved in any of the -- of the 18 communication with Ermaksan regarding the Lazer 19 Safe equipment. Is that correct? 20 Not that I recall. 21 Α The Lazer Safe -- strike that. Let me 22 Q show you another photo. 23 24 (Exhibit 11 marked for

identification.) 1 Okay. I'm gonna show you what we've 2 marked as Exhibit 11, and this is a photograph. 3 (Screen sharing.) 4 This is a photograph, I guess it's a 5 Q partial view, but can you recognize what this --6 7 this is showing us, what component it's showing us? Α Well, yes, it's a partial label --8 THE STENOGRAPHER: I'm sorry, can you 9 say that again? "It's a partial label." 10 Yeah. The image is cropped. 11 Α 12 0 Yeah. It's a partial label that's affixed to 13 the side of a PCSS F series controller, although I 14 can't see any detail of the product from this 15 16 angle. And can you tell from this photo if this 17 18 is a replacement PCSS controller or original 19 equipment? 20 Α No. 21 And then where it says -- on the far right of the photo, there's a box that says, 22 Soft -- Software VER, and it starts -- the first 23 letters are KERN. But is that referring to a type 24

```
of software?
 1
 2
                    MS. ADUKONIS: Objection.
 3
                    You can answer.
           Α
                Yes.
 4
                What is that -- what is that software?
 5
                Well, it refers to the Kernel software
 6
      that's the --
 7
           0
                And --
 8
                -- safety -- the Kernel software is the
9
      top of the safety operating software.
10
                And is that something that has to be
11
12
      maintained over time by Lazer Safe?
                    MS. ADUKONIS: Objection.
13
                    You can answer.
14
                Could you clarify what you mean by
15
16
      "maintained"?
17
                Yeah. Like are there periodic updates of
           Q
      the software for the customers that Lazer Safe
18
      provides?
19
           Α
                Yes.
20
                And how would a customer obtain the
21
      updates?
22
                    MS. GELLER: Objection.
23
24
                    You can answer.
```

a broad outline of the line of questioning in the 1 deposition. 2 And at some point you reviewed his 3 Q deposition transcript. Is that right? 4 5 Α Yes. Yeah. Q 6 7 Did you know Mr. Gary Holdson at THCO? 8 9 Α Yes. And was he involved -- what was his role 10 at THCO LLC, as far as you know? 11 It was a technical role. So he was 12 Α involved in integration of the products and 13 technical support. 14 And do you know whether Mr. Holdson was 15 16 involved in the October 2019 emails and issues raised with the Ermaksan press brake machine in 17 Holyoke, Massachusetts? 18 MS. ADUKONIS: Objection. 19 You can answer. 20 21 Α Yes. Did you ever speak with Mr. Holdson at 22 O the time about the incident? 23 24 MS. ADUKONIS: Objection.

EXHIBIT F

EXHIBIT 9
Jeffrey
Tannehill
1/15/25
J. Williamson



Tuesday, 13 March 2012

THCO LLC 2950 Spanish Oaks Drive Brenham TX 77833 USA

LETTER of AGREEMENT for supply of LAZER SAFE PRODUCTS

This letter is to confirm the business arrangements reached between Lazer Safe Pty Ltd ("Lazer Safe") Malaga, Western Australia and THCO LLC ("Master Distributor") 2950 Spanish Oaks Drive, Brenham TX 77833, USA to represent certain Lazer Safe Products in the USA on a non-exclusive basis.

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Purpose

- Master Distributor is appointed, accepting the understandings in clauses 2 to 4 with rights to sell and install LZS-003-HS systems to the retrofit market in the USA either directly or via partner organisations.
- Mutual understanding 1: Lazer Safe retains the right to sell direct to OEM manufacturers in North America whether or not that OEM has or is a customer of the Master Distributor.
- Mutual understanding 2: Certain OEM manufacturers have rights to install Lazer Safe systems on their press brakes and deliver them to customers world-wide including the USA.
- 4. Mutual understanding 3: Lazer Safe will, when approached by companies in the USA requiring retrofit systems, refer them to Master Distributor and/or other Authorised Distributors in the same territory. Authorised Distributors are defined as having signed a distributor agreement with Lazer Safe.
- Master Distributor for the purpose of operator safety and protection will promote Lazer Safe as the prime safety system for Press Brakes and will use its reasonable endeavours to sell the Products in the assigned territory.

Price

- The Initial Price of each product, provided in Schedule 1 hereto, is valid until 31st December 2012, unless otherwise modified as allowed by clause 7 herein, and subject to annual review as provided for in Clause 8.
- 7. Should the conversion rate between the Aust \$ and the USD change substantially outside the range of 0.80 to 0.90 then the USD price above may be adjusted down or up accordingly. The parties recognise that this could happen between order and payment and that in such an event they will use their best endeavours to resolve any issue arising. The purpose of this clause is to maintain price stability with the ability to handle the situation where major exchange rate variations occur.
- Prices are subject to annual review. Lazer Safe will give 90 days notice to any changes resulting from the annual review to be effective from 1st July in any year. In any event Lazer Safe reserves the right to adjust prices with immediate effect.

Ordering

 The Master Distributor will raise Purchase Orders clearly identifying the Product Code, Product Name, Quantity, Price per Unit and Total Price together with the Delivery Date required and



method of payment as provided for in Clause 13. On receipt of a purchase order Lazer Safe will. within 5 business days, confirm the order and advise the expected delivery date. On confirmation, the order becomes a legally binding contract between the parties.

Delivery

- 10. Lazer Safe's normal delivery time is 28 days from receipt of written orders from the Master Distributor. Lazer Safe will use its reasonable endeavours to supply the Products to meet requested Delivery Dates less than normal, should this not be practicable, Lazer Safe will, within 7 days of the receipt of the order, advise the Master Distributor and the parties shall agree an alternative Delivery Date and/or variation to the order. The times in this clause may be extended by agreement of the parties or by Lazer Safe where the order is for an unusually large number of Products.
- 11. Lazer Safe will deliver all batches together with their export formalities to the carrier designated by the Customer on an FCA (Free Carrier) basis. The terms of Free Carrier shall be as defined by International Commercial Terms (Incoterms) 1990, or shipped by Lazer Safe using Lazer Safe's nominated carrier and charged and invoiced accordingly. All costs, duties and charges associated with Delivery are to the Master Distributor's account. Delivery shall be to the Master Distributor's nominated address.
- 12. The products to be shipped will be packed in such a way, as to protect them from damage that could reasonably arise during transport by air, sea and road.

Payment

- 13. Goods or services to be provided by Lazer Safe will be quoted in USD. Master Distributor may nominate to pay by either of the following methods:
 - a. Payment in advance 100% by electronic funds transfer (EFT) to the bank and account nominated by Lazer Safe; or
 - b. Letter of Credit for the full amount payable on dispatch of goods by Lazer Safe from Australia.
 - c. Payment by the due date of credit terms as agreed between the parties.

Distribution

- 14. Master Distributor is authorised to sell systems and spare parts to other Authorised Distributors and Resellers within the USA. Resellers are defined as companies that do not have a signed distributor agreement with Lazer Safe.
- 15. Authorised Distributors will have the option to purchase systems and spare parts either from Lazer Safe directly or from Master Distributor.
- 16. Lazer Safe will make available to Master Distributor the system and spare parts pricing that is issued to Authorised Distributors within the USA.
- 17. Lazer Safe will promote via the Lazer Safe website that Master Distributor is authorised to stock and sell systems and spare parts within the USA.

Commissions

18. Lazer Safe will pay a commission to Master Distributor of 5% of the total sale price (excluding shipping charges) for all LZS-003-HS systems sold within the USA with the exception of systems sold to Original Equipment Manufacturers including the following companies:

1. LA



- Cincinnati Incorporated
- Accurpress
- 19. Commissions will be based on paid accounts, calculated every month and settled by mutual agreement (offset or direct payment). THE STALL OF THE SPECIAL OF TORONTON
- 20. Master Distributor is expected to provide technical support as required for the LZS-003-HS system to other distributors and customers that have purchased systems directly from Lazer Safe with the exception of;
 - Cincinnati Incorporated
- * Accurpress

Lazer Safe assistance

- 21. Provide installation manuals to Master Distributor and provide access to technical support in the Perth office.
- 22. Provide technical assistance, on an as available basis, in designing the interface for retrofit if Master Distributor is able to provide the necessary electrical and hydraulic schematics of the machines in question. It is anticipated that, within three months of commencement, the requirement for this assistance will be minimal once Master Distributor has developed the appropriate field experience and confidence. Lazer Safe reserves the right to charge a fee for this service if the demands of Master Distributor for such assistance are above this expectation.
- 23. Lazer Safe will keep Master Distributor informed of product developments in order for Master Distributor to evaluate applicability of such products to the market place in North America.
- 24. Lazer Safe will, on an as available basis, provide technical assistance to meet special needs that Master Distributor may identify. Lazer Safe reserves the right to charge a fee for this service if the demands of Master Distributor for such assistance are above this expectation.
- 25. Lazer Safe will pay USD\$2,000 per month for 6 months (starting from engagement date) to assist the distributor to engage the services of Chris King.

Distributor shall promote

26. Master Distributor shall, at their cost, promote and market the Products in line with the Purpose as described in this document.

Adverse advertising

27. If, in the reasonable opinion of Lazer Safe, Master Distributor is advertising or promoting the Products in a manner that is likely to adversely affect the reputation of Lazer Safe or the Products, Lazer Safe may give notice to Master Distributor of its objection to such advertising or promotion. On receipt of such notice, Master Distributor will immediately take such steps as are necessary for withdrawing and discontinuing such advertising

Alterations to specifications

28. Lazer Safe may, from time to time, alter the specifications or design of the Products and shall notify Master Distributor of such changes. Lazer Safe shall, for as long as is practical, continue to supply the currently agreed version under this agreement and not start to supply the modified versions of the Product without prior written acceptance from Master Distributor. In the event that

19-14



any safety, defect related, or other concern or issue related to the Product arises Lazer Safe shall at its sole discretion modify the specifications.

 All trademarks used in relation to the Products are the property of Lazer Safe, Lazer Safe grants to Master Distributor a licence to use Lazer Safe's trademarks for the purpose of Master Distributor fulfilling its obligations under this agreement. All use of the trademarks by Master Distributor accrues to the benefit of Lazer Safe. Master Distributor will not apply to register any trademark which is the same as or similar to Lazer Safe's trade marks. Distributor will not use any other trademark in relation to the Products except with the prior written permission of Lazer Safe.

Ownership of intellectual property

30. Lazer Safe retains ownership of all intellectual property rights relating to the Products including any Improvements made by Lazer Safe.

Internet Domain Addresses

31. Lazer Safe acknowledges that the Master Distributor may register internet domain names that contain the words 'Lazer Safe' or words similar that purport to represent Lazer Safe. The Master Distributor acknowledges that Lazer Safe gives permission for such address(es) to be registered and used for the purpose of facilitating the Master Distributor's sales of Lazer Safe's products. Permission to use such registrations is given on the basis of compliance with the terms of this agreement. The Master Distributor agrees to transfer any such registrations to Lazer Safe or cancel them on the written request of Lazer Safe.

Customer improvements

32. Lazer Safe will own any intellectual property rights in any Improvement in the Products made by Master Distributor. Master Distributor hereby assigns such intellectual property rights to Lazer Safe. Master Distributor will execute such documents and do such things as are reasonably necessary or desirable to give affect to this clause.

Intellectual property indemnity

33. Master Distributor agrees that Lazer Safe has the right to defend, or at its option to settle, and Lazer Safe agrees, at its own expense, to defend or at its option to settle, any third party claim. suit or proceeding (collectively, "Action") brought against Master Distributor alleging the Products infringe any patent or copyright in existence as of the Effective Date, subject to the limitations hereinafter set forth. Lazer Safe will have sole control of any such Action or settlement negotiations, and Lazer Safe agrees to pay, subject to the limitations hereinafter set forth, any final judgment entered against Master Distributor on such issue in any such Action defended by Lazer Safe. Master Distributor agrees that Lazer safe will be relieved of the foregoing obligations unless Master Distributor notifies Lazer Safe promptly in writing of such Action, gives Lazer Safe authority to proceed as contemplated herein, and gives Lazer Safe proper and full information and assistance to settle and/or defend any such Action. If it is adjudicatively determined, or if Lazer Safe believes, that the Products, or any part thereof, infringe any third party patent or copyright, or if the sale or use of the Products, or any part thereof, is, as a result, enjoined, then Lazer Safe may, at its election, option, and expense: (i) procure the right under such third party patent, or copyright to sell or use, as appropriate, the Products or such part thereof; or (ii) replace the Products, or part thereof, with other non-infringing suitable Products or parts; or (iii) suitably modify the Products or part thereof, or (iv) remove the Products, or part thereof, terminate distribution or sale thereof and refund the payments paid by Master Distributor for such Products

1. 14



less a reasonable amount for use and damage. Lazer Safe will not be liable for any costs or expenses incurred without its prior written authorization.

Limitations to indemnity

34. Lazer Safe has no liability to Master Distributor for (i) any infringement of patent or copyright claims alleging infringement by completed equipment or any assembly, circuit, combination, method or process in which any of the Products may be used but not covering the Products standing alone; (ii) any trademark infringements involving any marking or branding not applied by or requested by Lazer Safe, or involving any marking or branding applied by Lazer Safe at the request of Master Distributor; or (iii) the modification of the Products, or any part thereof, unless such modification was made by Lazer Safe, where such infringement would not have occurred but for such modifications.

Entire liability

35. THE FOREGOING STATES THE ENTIRE LIABILITY AND OBLIGATIONS OF LAZER SAFE AND THE EXCLUSIVE REMEDY OF MASTER DISTRIBUTOR AND ITS CUSTOMERS, WITH RESPECT TO ANY ALLEGED PATENT OR COPYRIGHT INFRINGEMENT BY THE PRODUCTS OR ANY PART THEREOF.

Confidentiality obligations

- 36. Each party undertakes that:
 - a. it will not directly or indirectly disclose the other's Confidential Information in whole or in part to any third party without the prior written consent of the other party;
- b. it will not directly or indirectly use the other party's Confidential Information in whole or in part except as provided in this agreement,
- c. it will not copy, duplicate or otherwise reproduce any documents containing Confidential Information except as is necessary under this agreement;
 - d. it will use its best endeavours to preserve the confidentiality of the Confidential Information and will (without limitation):
 - e. keep all documents containing Confidential Information in a secure place;
 - f. restrict the access of officers or employees or contractors to documents containing the Confidential Information to persons who need to know such information:
 - g. clearly mark all documents containing Confidential Information as being confidential;
 - h. if requested by the other party, procure that each employee or contractor who has access to Confidential Information signs a confidentiality agreement with the party owing the Confidential Information;
 - i. take such other steps as are reasonably required by the other party as notified in writing to it from time to time;
 - it will forthwith upon demand return to the owner of the Confidential Information all documents containing confidential information, including any documents created by its officers, employees or contractors which contain any confidential information.

Reverse engineering of Product

37. Master Distributor will not attempt to reverse engineer the Products or subject them to any form of analysis or test for the purpose of ascertaining the construction, formulation or make up of the Products (or permit any third party to do any of these things). Excluded from this section are repairs or improvements as may be conducted by Master Distributor, reliability testing or testing related to standards compliance.

11. RA.



Obligations

38. The parties' obligations under this agreement in relation to the Confidential Information shall continue after the return of the Confidential Information or termination of this agreement until such time as the Confidential Information is lawfully in the public domain.

Warranty

 Lazer Safe warrants that, at the time of delivery, the Products shall be in accord with specifications, be free from defects in design and workmanship and warranted for a period of 24 months.

Consequential loss

40. In no event shall either party be liable for lost profits, cost of procurement of substitute goods, or any other special, reliance, incidental, or consequential damages, however caused and under any theory of liability whether based in contract, tort (including negligence), or otherwise.

Indemnity

- Master Distributor will indemnify Lazer Safe, and keep Lazer Safe indemnified, against any loss or damage (including legal costs) suffered by Lazer Safe arising out of;
 - a. any breach of this agreement by Master Distributor;
 - any claim by any third party relating to the improper sale or installation (by Master Distributor)
 of the Products by Master Distributor provided that such claim does not result from a failure of
 a Product to comply with its written specifications as provided by Lazer Safe.

Relationship

42. The relationship between the parties is that of independent contracting parties only. There is no relationship of agency, partnership or otherwise between the parties. The Master Distributor must note this independent relationship on all official, advertising or marketing material. The Master Distributor must not purport to be a subsidiary or a branch of Lazer Safe.

Variation

43. This agreement may be varied only in writing signed by the parties.

Force Majeure

44. Neither party will be liable for any delay or failure to perform its obligations under this agreement if such delay is due to circumstances beyond its reasonable control.

Entire agreement

This agreement supersedes all prior writings or understandings between the parties with respect
to its subject matter.

Disputes

- 46. If any dispute arises between the parties regarding this agreement which cannot be settled by negotiation:
 - a. the parties will refer the dispute to senior management;
 - b. failing settlement of the dispute, the parties will endeavour to settle the dispute by mediation;
- c. failing settlement of the dispute, either party may refer the dispute to arbitration;

provided that nothing in this clause prevents a party immediately commencing legal proceedings for urgent equitable relief before an appropriate court.

Mr. Ax



Counterparts

47. This agreement may be executed in counterparts, each of which will be deemed to be an original and all of which taken together will constitute the same agreement, provide that this agreement will be of no force or effect until the counterparts are exchanged.

Commencement

48. The activation of this agreement is achieved when both parties have signed and dated this document and supersedes and cancels any previous agreements between the afore mentioned company's. The details are private and confidential, breach of which could result in cancellation.

Termination

49. Either party may terminate this agreement with 60 days notice without reason.

smogrmod en in a succession of the

Mr. ft.



This agreement shall be adhered to in a spirit of mutual benefit, open communication and practicability.

I hereby acknowledge and accept the terms of this agreement.

Lazer Safe Pty Ltd

Name: ROB. APREYARD.

Signed:

Date: 14-03-2012

By signing the above, I also declare that I am authorised by the company to commit to this agreement THCO LLC.

1 / 1 minum

Date

3-15- FULF

By signing the above, I also declare that I am authorised by the company to commit to this agreement



Schedule 1

For Lazer Safe LZS-003-HS System (Based on orders for complete systems)

LZS-003-HS High Speed Guarding System

| LZS-003-HS Control Module w/std box- Product code 0012000600 | USD 1,612.00 FOB Perth |
|--|------------------------|
| LZS-003-HS Control Module (no box) - Product code 0012000300 | USD 1,368.00 FOB Perth |
| LCD Operator Panel - Product code 0017001200 | USD 300.00 FOB Perth |
| TX Dual Laser & RX w/M12 plugs - Product code 0011002100 | USD 1,623.00 FOB Perth |
| TX/RX M12 Socket Cable 5m - product code 0031030900 | USD 20.00 FOB Perth |
| TX/RX M12 Socket Cable 10m - product code 0031031000 | USD 30.00 FOB Perth |
| | |

VERTICAL BRACKETS

| ir bearing vertical brackets -
LITE 500 model | Product code 0018002100 | r nd | USD 770.00 FOB Perth | |
|--|-------------------------|------|------------------------|--|
| or bearing vertical brackets -
STD 610 model | Product code 0018001200 | | USD 1,104.00 FOB Perth | |
| ar bearing vertical brackets - | Product code 0018001600 | | USD 1,232.00 FOB Perth | |





Schedule 2 For Lazer Safe LZS-003-HS Spare Parts

| 0036001900 | 1000mm Metric Adjustment Guide Set | USD 10.00 |
|------------|---|--------------|
| 0041020300 | Brass Latch (long) | USD 62.00 |
| 0041020100 | Brass Latch (short) | USD 62.00 |
| 0036030100 | Decal - LCD Panel | USD 31.00 |
| 0012061700 | Encoder Chain & Accessories | USD 52.00 |
| 0012061600 | Encoder Mounting Bracket - Right Angle | USD 18.00 |
| 0012061500 | Encoder Mounting Bracket - Straight | USD 18.00 |
| 0039050200 | Handle Bolt - M10 x 50mm | USD 29.00 |
| 0039050100 | Handle Bolt - M8 x 25mm | USD 29.00 |
| 0036090100 | Lexan Controller English | USD 54.00 |
| 0036090300 | Lexan Controller French | USD 54.00 |
| 0036091100 | Lexan Controller Spanish | USD 54.00 |
| 0012065100 | LZS Standard Outer Box | USD 423.00 |
| 0011190800 | LZS STD Alignment Quick Reference Guide | USD 3.00 |
| 0012020100 | LZS STD Plug Kit | USD 108.00 |
| 0012050100 | LZS-003 Processor Assembly | USD 850.00 |
| 0012050400 | LZS-003-HS Processor Assembly | USD 850.00 |
| 0012061200 | Optical Encoder - Omron | USD 430.00 |
| 0017000500 | PLC Interface Card w/plugs | USD 255.00 |
| 0011139000 | RX Replacement Window Assembly | USD 30.00 |
| 0011131100 | RX w/m12 plug | USD 480.00 |
| 0011190200 | STD Alignment Magnet Set | USD 29.00 |
| 0040000500 | Switch - Key (mode) | USD 47.00 |
| 0040000800 | Switch - Push Button (test/lock) | USD 94.00 |
| 0040000700 | Switch - Rotary (selector) | USD 115.00 |
| 0011121700 | TX Dual Laser w/m12 plug | USD 1,130.00 |
| 0011121600 | TX Single Laser w/m12 plug | USD 859.00 |

1.4.

EXHIBIT G

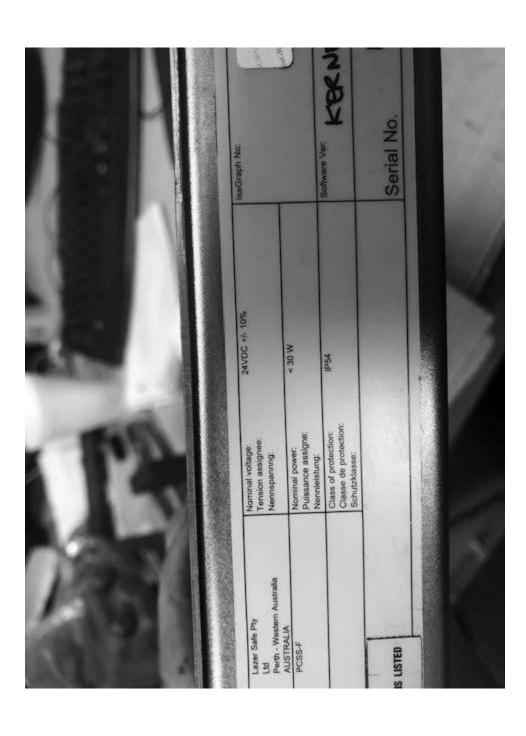
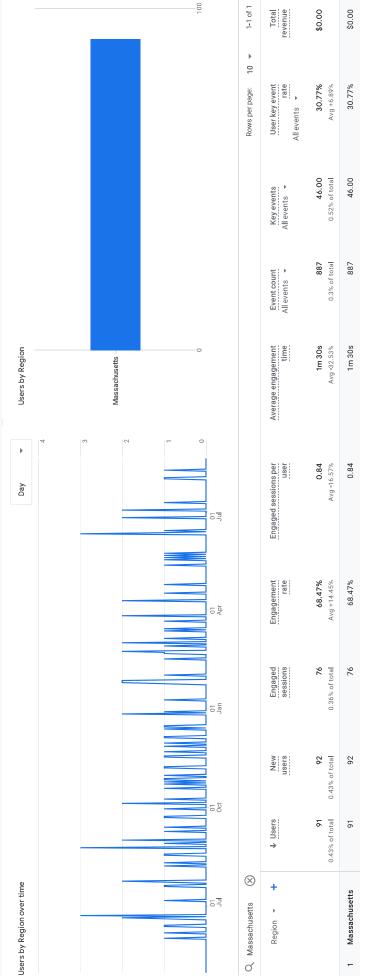


EXHIBIT H

Demographic details: Region 🛇 🔻

Add filter +





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EXHIBIT I

Document 108-1 Filed 11/26/25 Page 124 of 189

Dimensions and metrics

[GA4] Engagement rate and bounce rate

Use the engagement rate and bounce rate metrics to measure engagement on your website or app

| Next: [GA4] Create content groups | |
|-----------------------------------|--|
|-----------------------------------|--|

Case 3:23-cv-30016-MGM

About the metrics

Engagement rate and bounce rate are important metrics in Google Analytics that enable you to measure and analyze user engagement with your website or app.

Both metrics are defined in terms of engaged sessions.

- · A session is a period during which a user is engaged with your website or app.
- An engaged session is a session that meets any of the following criteria:
 - · Lasts longer than 10 seconds
 - Has a <u>key event</u>
 - · Has 2 or more screen or page views

The engagement rate is the **percentage of engaged sessions** on your website or mobile app. The bounce rate is the opposite of the engagement rate. The bounce rate is the **percentage of sessions that were not engaged**.

Note: The is_engaged_session_event has been added to all events to improve the accuracy of engagement rate and bounce rate calculations.

In other words, engagement rate helps you measure the percentage of visits to your website or app that involved some form of meaningful engagement.

An example

For instance, a user visits your website, reads some content for less than 10 seconds, and then leaves. While they were on your website, they didn't trigger any events or visit any other pages.

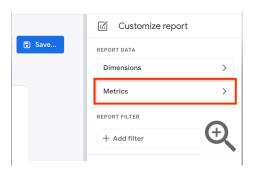
In this instance, because the user didn't match any of the criteria of an engaged session (the session was less than 10 seconds, no key event occurred, and there were not at least 2 pageviews or screenviews), the session would not count as an engaged session. If this were the only session on your website, the engagement rate would be 0% and the bounce rate would be 100%.

Add the metrics to your reports

By default, most reports in Google Analytics do not include the engagement rate and bounce rate metrics. To view these metrics in your reports, you need to customize the report. You can customize a report if you are an <u>Editor or Administrator</u>. You can only add metrics to <u>detail reports</u>.

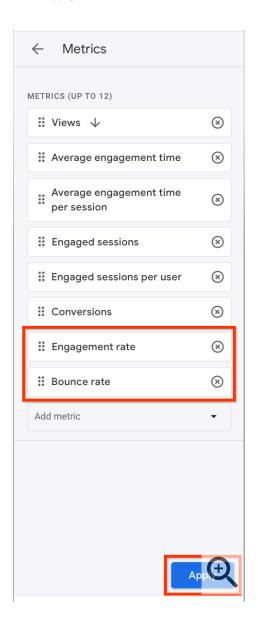
- 1. Sign in to Google Analytics
- 2. From the left menu, select Reports II.
- 3. Go to the report you want to customize, such as the Pages and screens report.
- 4. Click **Customize report** [//] in the upper-right corner of the report.

5. In Report data, click Metrics.



If you only see Add Cards and don't see Metrics, you are in an overview report. You can only add metrics to a detail report.

- 6. Click **Add metric** (near the bottom of the right menu).
- 7. Type "Engagement rate". If the metric doesn't appear, it's already included in the report.
- 8. Type "Bounce rate". If the metric doesn't appear, it's already included in the report.
- 9. Click Apply.





10. Save the changes to the current report.

The engagement rate and bounce rate metrics will be added as the last two columns in the table. If you have many metrics in the table, you may need to scroll to the right to view the metrics.

Increase your engagement rate

If your engagement rate is low, then consider using reports and explorations in Analytics to dig deeper to see whether it's uniformly low or whether it's the result of certain channels, source/medium pairs, pages or screens, or something else.

For example, if a few pages or screens have a low engagement rate, see whether the content correlates well with the marketing you use to drive users to those pages or screens, and whether those pages or screens offer users easy paths to the next steps you want them to take.

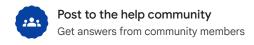
If a certain channel has a low engagement rate, review your marketing efforts for that channel. For example, if users who come from display are bouncing, make sure your ads are relevant to your site content.

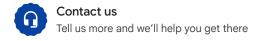
If the problem is more widespread, take a look at your measurement code to be sure that all the necessary pages are tagged and that they are tagged correctly. If you're collecting data from an app, make sure you've set up the Google Analytics for Firebase SDK correctly.

Note: Events such as first_visit, first_open, and session_start are excluded from the calculation of your engaged sessions even if it is marked as a key event.

Next: [GA4] Create content groups

Need more help?





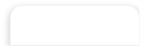


EXHIBIT J



SİPARİŞ BİLGİ FORMU

| İ | AA. | AVİNIA | CEDI | NIO 9 | : SN20071136 | |
|---|-----|--------|------|-------|--------------|--|
| ı | IAI | | SELL | IAO ' | . 3NZUU/1130 | |

| ÜRÜN ADI | : CNC SAP 3760 x 200 TN (S) 🗸 | |
|----------|---------------------------------|--|
| | | |

| A J MACHINERY | U.S.A |
|---------------|-------|
| | |
| | |

| SİPARİŞ TARİHİ | : 25.09.2007 | TESLÍM TARÍHÌ : | 11.10.2007 | |
|----------------|--------------|-----------------|------------|--|
| NI WKB 190011 | . 20.07.2007 | EQUALITATION. | 11.10.2007 | |

| Kontrolör | : DELEM DA 66W (RENKLİ GRAFİK) KONTROLÖR 🗸 | 1 |
|-------------------|--|------------|
| Eksen | : 7 EKSEN (Y1, Y2, X1, X2, Z1, Z2, R)V | 1 |
| Boğaz Derinliği | : 400 MM BOĞAZ DERİNLİĞİ V / / / / / / / / / / / / / / / / / / | 1 |
| Üst Kalıp | : AMERÎKAN ÜST KALIP | 1 |
| Alt Kalıp | : 2009 - 4016 = M.460 - C.1050.R ALT KALIP | 1 |
| Kuip Tutucular | : AMERİKAN PROMECAM (HIZLI DEĞİŞTİRİLEBİLİR) 🗸 | 1 |
| Wila Sistemi | : MOTORLU WILA SİSTEMİ | 1 |
| Arka Koruma | : FOTOSEL (FIESSLER CAT.04) ARKA KORUMA 🗸 | 1 |
| Ön Koruma | : PCSS PLC'Lİ LAZER ÖN KORUMA 🗸 | į 1 |
| Kürsü | ; ÇİFT AYAK PEDALLI | 1 |
| Hidrolik Sistem | : HOERBIGER HIDROLIK SISTEM 🗸 | 1 |
| Elektrik Sistemi | : SIEMENS ELEKTRİK SİSTEMİ 🗸 | 1 |
| Elektrik Gerilimi | : 220-440 V 60/3 ELEKTRİK GERİLİMİ 🔑 | 1 |
| Renk | : RAL 7035 , RAL 9007 RENKLER 🔑 | 1 |
| Etiket | : INGILIZCE ETIKET | 1 |
| Kullanma Kılavuzu | : İNGİLİZCE KULLANMA KILAVUZU 🏒 | 1 |
| la Dayama Sistemi | : ERMAKSAN SEKSEN ARKADAYAMA (X:1000MM R:160MM) U | 1 |
| Diğer | : X1 + X2 AXIS ✓ | 1 |
| Diğer | : Z1 + Z2 AXIS 🗸 | 1 |

ÖZEL İSTEKLER

MAKİNANIN TÜM AYARLARI INCH'LI OLACAKTIR 🖰 🗸 MAKİNANIN ÜZERİNDE CNC SAP 12'X220" YAZACAKTIR 🗕 🗸 MAKİNA FUAR MAKİNASIDIR. YAĞLI SEVK EDİLECEKTİR 🗎 🏑

MAKINA 7 EKSENDIŔ (Y1-Y2, X1-X2, Z1-Z2, R)□√

AJ MACHINERY'NÍN SN20070859 MAKINESÍ ÍLE BERABER SEVK EDÍLECEKTÍR

| MA MAGINIAEKI MIN ONZOOFOO | THANKINGOI ILL DENADER OF TRE | DIECULI(III) | |
|----------------------------|-------------------------------|--------------|------------|
| | | | |
| SATIŞ SORUMLUSU | / SATIŞ MÜDÜRÜ | PLANLAMA | 76-09-7002 |
| ALÍ ÖZKAN | NESCHAN ÖZKAYAN | | W |
| F.MII.005 | | | REV.00 |

ERM0001

27/09/104



Document 108-1 Filed 11/26/25 Page 129 of 189

PROFORMA INVOICE

A J MACHINERY

SWIFT CODE:

20000-176th St. Big Lake 55309 55309 MN U.S.A

TEL (763) 262-8070 FAX (763) 262-8071 denine@ajmachinery.net www.ajmachineryonline.com

ORDER NO : SN20071136 PROF. DATE 30.03.2023

ORDER DATE : 25.09.2007 REF. NO

| DESCRIPTION OF THE GOODS | QTY | UNIT PRICE | | TOTAL PRIC | E |
|---|-----|------------|--------|------------|-----|
| CNC SAP 3760 x 200 TN HIGH SPEED SYNC. HYD. PRESS BRAKE | 1 | 64.500 | USD | 64.500 | USD |
| ERMAKSAN 2 AXIS BACKGAUGE (X:1000MM R:160MM) | 1 | 1.000 | USD | 1.000 | USD |
| X1 + X2 AXIS | 1 | 9.200 | USD | 9.200 | USD |
| Z1 + Z2 AXIS | 1 | 8.300 | USD | 8.300 | USD |
| | | | | | |
| | | | | | |
| | | | | | |
| | | NET T | OTAL : | 83.000 | USD |

NET TOTAL : | **SPECIFICATIONS** QTY DELEM DA 66W COLOR GRAPHICAL CONTROLLER 1 7 AXIS (Y1, Y2, X1, X2, Z1, Z2, R) 1 400 MM THROAT DEPTH 1 AMERICAN TOP TOOL 1 PLEASE CHECK, STAMP AND SIGN TO CONFIRM 2009 - 4016 = M.460-R - C.1050.R BOTTOM TOOLING 1 AMERICAN PROMECAM QUICK RELEASE 1 MOTORIZED CROWNING SYSTEM PHOTOCELL (CAT.04) REAR GUARD FIESSLER/M2000 SICK 1 LASER SAFETY DOUBLE BEAM FRONT GUARD & PCSS PLC 1 DOUBLE FOOT PEDAL CONTROLLER 1 HOERBIGER HYDRAULIC SYSTEM 1 SIEMENS ELECTRIC SYSTEM 1 220-440 V 60/3 ELECTRIC VOLTAGE 1 RAL 7035 , RAL 9007 COLORS 1 **ENGLISH LABEL ENGLISH MANUAL**

Above prices and specifications are subject to change after 10 days from the document date without notice.

DELIVERY DATE : 11.10.2007 **DELIVERY TERM** : EXWORKS / BURSA PAYMENT CONDITION : 20% WITH THE ORDER, 80% BEFORE LOADING

CITITRIX

OUR BANK DETAILS: CITIBANK A.Ş. / BURSA BRANCH / TURKEY **EUR IBAN CODE:** TR320009200000000603186036 603186-036 **EUR ACCOUNT NR:**

USD IBAN CODE: TR540009200000000603186028 USD ACCOUNT NR: 603186-028

INT. SALES EXECUTIVE SALES MANAGER GUROL GEROĞLU **NESLIHAN OZKAYAN**

WARRANTY: 12 months for parts, Our warranty is limited to replacing parts found to be defective, consumable items not included. We reserve the right to invoice service visits found to be necessary due to incorrect use of the machine or lack of maintenance. The responsibility of ERMAKSAN is limited to the clause here above. This limitation excludes liability for indirect damages which include loss of production, turnover or profits.

INSTALLATION AND TRAINING: Installation and training is not included in the machine's price and will be invoiced separately if requested.

| Company Address : | Ermaksan Mak. San. Ve Tic. Ltd. Şti. | Yeni Yalova Yolu 15. K | m 16335 Ovaakça / Bursa / Turkey |
|-----------------------|--------------------------------------|----------------------------|----------------------------------|
| TEL +90 224 267 19 00 | FAX +90 224 267 14 40 | http://www.ermaksan.com.tr | ermaksan@ermaksan.com.tr |

From: ALI EVCI

Sent:Monday, November 25, 2019 12:33 AMTo:customerservice@lazersafe.com.auCc:UFUK KOCAEL; UMIT YILDIZ; SERVICE

Subject: RE: [rt.lazersafe.com.au #10894] FW: Lazer safe PCSS com. error (I need help please!)

Mehmet Bey Merhaba,

Henüz servis yönlendiremedik. İsterseniz konuyu kapatabilirsiniz. İhtiyaç halinde tekrar sizinle irtibata geçeriz. Çünkü şu an için net birşey söyleyemiyoruz. İlginize teşekkürler.

Best Regards,

----Original Message----

From: Mehmet Tatli via RT [mailto:customerservice@lazersafe.com.au]

Sent: Monday, November 25, 2019 8:30 AM

To: ALI EVCI; SERVICE

Subject: RE: [rt.lazersafe.com.au #10894] FW: Lazer safe PCSS com. error (I need help please!)

Ali bey, Ümit bey merhaba,

Bu konuyla ilgili son durum nedir?

Regards

Mehmet TATLI

Customer Service

Lazer Safe Pty Ltd

27 Action Road

Malaga, WA 6090

Australia

T+61 8 9249 4388

F+61 8 9249 6011

M +90 532 566 6879

E mehmet.tatli@lazersafe.com

From: Mehmet Tatli via RT <customerservice@lazersafe.com.au>

Sent: Sunday, November 24, 2019 11:30 PM

To: ALI EVCI; SERVICE

Subject: RE: [rt.lazersafe.com.au #10894] FW: Lazer safe PCSS com. error (I need help please!)

Attachments: image001.png; image002.png; image003.png; image004.png; image005.png;

image007.png; image008.png

Ali bey, Ümit bey merhaba,

Bu konuyla ilgili son durum nedir?

Regards

Mehmet TATLI

Customer Service

Lazer Safe Pty Ltd

27 Action Road

Malaga, WA 6090

Australia

T+61 8 9249 4388

F+61 8 9249 6011

M +90 532 566 6879

E mehmet.tatli@lazersafe.com

Follow Us:

 $\label{lem:cid:image001.png@01D31FEB.80272120} cid:image002.png@01D31FEB.80272120\\ cid:image003.png@01D31FEB.80272120\\$

cid:image004.png@01D31FEB.80272120

cid:image005.png@01D31FEB.80272120

signature_1449061529

----Original Message----

From: ALI EVCI via RT <customerservice@lazersafe.com.au>

Sent: Tuesday, October 15, 2019 9:12 AM

To: Mehmet Tatli <mehmet.tatli@lazersafe.com> Subject: FW: [rt.lazersafe.com.au #10894] FW: Lazer safe PCSS com. error (I need help please!)

Ufuk Abi Merhaba,

Amerika'daki Lazersafe sıkıntısı olan 2007 model makine için Lazersafe PCSS-F siparişi yapılacak ancak programına ihtiyaç vardır. Bu makinadaki program kayıtlarımızda yok. Altta Mehmet Bey'in dediğini orada yapabilirmisiniz ya da yaptırabilrimisiniz? Bu sayede PCSS içindeki programın ismini görelim ve yenisine yükleyelim.

| Best Regards, |
|---|
| Original Message |
| From: Mehmet Tatli via RT [mailto:customerservice@lazersafe.com.au] |
| Sent: Tuesday, October 15, 2019 9:02 AM |
| To: ALI EVCI; SERVICE |
| Subject: RE: [rt.lazersafe.com.au #10894] FW: Lazer safe PCSS com. error (I need help please!) |
| Ali bey günaydın, |
| Arızalı olan PCSS'e kernel ve isagraf yüklemeği deneyebilecek kimse yok mu Amerika'da? |
| Regards |
| Mehmet TATLI |
| Customer Service |
| Lazer Safe Pty Ltd |
| 27 Action Road |
| Malaga, WA 6090 |
| Australia |
| T +61 8 9249 4388 |
| F +61 8 9249 6011 |
| M +90 532 566 6879 |
| E mehmet.tatli@lazersafe.com |
| Follow Us: |
| Original Message |

From: ALI EVCI via RT <customerservice@lazersafe.com.au>

Sent: Tuesday, October 15, 2019 8:43 AM

To: Mehmet Tatli <mehmet.tatli@lazersafe.com>

Subject: RE: [rt.lazersafe.com.au #10894] FW: Lazer safe PCSS com. error (I need help please!)

Mehmet Bey Merhaba,

Sipariş durumunda direk adrese yönlendireceğimizden yüklemenin yapılıp gönderilmesini tercih ediyoruz ancak program konusunda yardımınıza ihtiyacımız var çünkü kayıtlarımızda hangi programın yüklü olduğu mevcut değil. Onu bulmak için yardımcı olabilir misiniz? Makinanın üzerindeki PCSS fotosu, makine parametreleri ve projesini ekliyorum.

Muhtemel gönderi adresi;

ErmakUSA Inc.

2860 S River Rd, Suite 145,

Des Plaines, IL 60018

USA

Best Regards,

From: Mehmet Tatli

Sent: Friday, October 18, 2019 10:27 AM

To: UMIT YILDIZ <umit.yildiz@ermaksan.com.tr>; Customer Service (Lazersafe) <csresponder@lazersafe.com>

Cc: YEDEK_PARCA <sparepart@ermaksan.com.tr>

Subject: RE: [rt.lazersafe.com.au #10894] FW: Lazer safe PCSS com. error (I need help please!)

Ümit bey merhaba,

Belirtilen Amerika adresine 1 x PCSS-F1 için kargo ücreti yaklaşık 95 EURO (DAP).

Regards

Mehmet TATLI

Customer Service

Lazer Safe Pty Ltd

27 Action Road

Malaga, WA 6090

Australia

T+61 8 9249 4388

F+61 8 9249 6011

M +90 532 566 6879

E mehmet.tatli@lazersafe.com

Follow Us:

cid:image001.png@01D31FEB.80272120 cid:image002.png@01D31FEB.80272120 cid:image003.png@01D31FEB.80272120

cid:image004.png@01D31FEB.80272120

cid:image005.png@01D31FEB.80272120

cid:image008.png@01D5A30E.16363AA0 signature 1449061529

From: Mehmet Tatli

Sent: Tuesday, October 15, 2019 5:36 PM

To: UMIT YILDIZ <umit.yildiz@ermaksan.com.tr>; Customer Service (Lazersafe) <csresponder@lazersafe.com>

Cc: YEDEK_PARCA <sparepart@ermaksan.com.tr>

Subject: Re: [rt.lazersafe.com.au #10894] FW: Lazer safe PCSS com. error (I need help please!)

Ümit bey,

Ali bey aşağıdaki adresi verdi, onun için fiyat sordum, yarın cevap gelir büyük ihtimalle.

ErmakUSA Inc.

2860 S River Rd, Suite 145,

Des Plaines, IL 60018

USA

Thank you

Mehmet Tatlı

Customer Service

Lazer Safe Pty Ltd

25 Action Road

Malaga, WA 6090

Australia

T+61 8 9249 4388

F+61 8 9249 6011

M +90 532 566 6879

E mehmet.tatli@lazersafe.com

Follow Us:

http://clients.axiomdp.com.au/lazersafe/email/img/laz-icon-twitter.png http://clients.axiomdp.com.au/lazersafe/email/img/laz-icon-linkedin.png http://clients.axiomdp.com.au/lazersafe/email/img/laz-icon-youtube.png

Lazer Safe Logo

Performance without compromise.

From: UMIT YILDIZ <umit.yildiz@ermaksan.com.tr>

Sent: Tuesday, October 15, 2019 5:28:28 PM

To: Mehmet Tatli <mehmet.tatli@lazersafe.com>; Customer Service (Lazersafe) <csresponder@lazersafe.com>

Cc: YEDEK_PARCA <sparepart@ermaksan.com.tr>

Subject: RE: [rt.lazersafe.com.au #10894] FW: Lazer safe PCSS com. error (I need help please!)

Mehmet Bey merhaba;

Aşağıdaki adres için gönderi ücreti verebillir misiniz?

Best regards.

----Original Message----

From: Mehmet Tatli [mailto:mehmet.tatli@lazersafe.com]

Sent: Tuesday, October 15, 2019 9:48 AM

To: UMIT YILDIZ <umit.yildiz@ermaksan.com.tr>; Customer Service (Lazersafe) <csresponder@lazersafe.com>

Cc: YEDEK PARCA < sparepart@ermaksan.com.tr>

Subject: RE: [rt.lazersafe.com.au #10894] FW: Lazer safe PCSS com. error (I need help please!)

Merhaba Ümit bey,

Sadece yedek parça olarak satılan ve gelecek yıl tedavülden kalkması planlanan bir ürün olduğu için, dediğiniz gibi fiyatlar yüksek maalesef.

Eski nesil PCSS-F1'den yeni nesil PCSS-A1'e bağlantı dönüşümünü yapabilirsiniz.

Halihazırda PCSS-A1 + Delemli makine için Ermaksan'da elektrik projesi ve PCSS programı zaten mevcut, onun üzerinden bu iş yapılabilir, ancak bu aşamada kabloların F1'den çıkarılıp tek tek A1'e bağlanması gerekecektir.

Zaten ekteki ECP'ye göre gelecek yılın başından itibaren eski nesil PCSS'Fx'lerin üretimi bitirilecek, yani her halükarda böyle dönüşüm projelerinin yapılması gerekecek. Bu iş için şu aşamada zor ama gelecek için bizim önerimiz, dönüşüm için soketli/konnektörlü hazır kablo kiti hazırlayıp işi daha kolay hale getirmenizdir.

Regards Mehmet TATLI Customer Service

Lazer Safe Pty Ltd
27 Action Road
Malaga, WA 6090
Australia
T +61 8 9249 4388
F +61 8 9249 6011
M +90 532 566 6879
E mehmet.tatli@lazersafe.com
Follow Us:

----Original Message----

From: UMIT YILDIZ <umit.yildiz@ermaksan.com.tr>

Sent: Tuesday, October 15, 2019 9:31 AM

To: Mehmet Tatli <mehmet.tatli@lazersafe.com>; Customer Service (Lazersafe) <csresponder@lazersafe.com>

Cc: YEDEK_PARCA <sparepart@ermaksan.com.tr>

Subject: RE: [rt.lazersafe.com.au #10894] FW: Lazer safe PCSS com. error (I need help please!)

Mehmet Bey merhaba;

Teklifiniz için teşekkür ederiz ancak ürün fiyatı çok pahalı. Bunun yerine güncel ürün bağlantısı yapılamaz mı? bilgi verebilir misiniz?

Best regards.

----Original Message-----

From: Mehmet Tatli [mailto:mehmet.tatli@lazersafe.com]

Sent: Monday, October 14, 2019 7:07 PM

To: Customer Service (Lazersafe) <csresponder@lazersafe.com>

Cc: UMIT YILDIZ <umit.yildiz@ermaksan.com.tr>; YEDEK_PARCA <sparepart@ermaksan.com.tr> Subject: RE: [rt.lazersafe.com.au #10894] FW: Lazer safe PCSS com. error (I need help please!)

Ümit bey merhaba,

1, Talep etmiş olduğunuz ürün için sipariş kodu, açıklama ve fiyat bilgisi aşağıdaki gibidir;

0013000700 --- PCSS-F IO01 w/Guard Counter 1 --- 3378.00 EURO

2, Arızalı PCSS'teki Isagraf Uygulama(PCSS programı) ismini biliyor musunuz?

PCSS'e program yüklemesini kim yapacak? Eğer Lazer Safe yapacaksa, programın bir kopyasının(.pia formatında) sipariş ile beraber gönderilmesi gerekiyor.

Yükleme ücreti için de sipariş kodu, açıklama ve ücret aşağıdaki gibidir;

ISAGRAF001 --- IsaGRAF loading charge --- 135.00 EURO

3, Ürünün gideceği adresi belirtirseniz fiyat sorabilirim, ancak daha önce de belirttiğimiz üzere ürünün gerçek fiyatı fatura üzerinde görünecektir, bilginiz olsun.

Regards

Mehmet TATLI Customer Service

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Malaga, WA 6090
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E mehmet.tatli@lazersafe.com

Follow Us:

From: UMIT YILDIZ <umit.yildiz@ermaksan.com.tr>

Sent: Monday, October 14, 2019 3:47 PM

To: Mehmet Tatli <mehmet.tatli@lazersafe.com> Cc: YEDEK_PARCA <sparepart@ermaksan.com.tr>

Subject: FW: Lazer safe PCSS com. error (I need help please!)

Mehmet Bey merhaba;

Ekteki PCSS için Teklif iletebilir misiniz ? Ürün Amerika ya gidecek mümkünse nakliye fiyatını da iletmenizi rica ederim.

Best regards.

-----Original Message-----

From: ALI EVCI via RT <customerservice@lazersafe.com.au>

Sent: Monday, October 7, 2019 1:34 PM

To: Mehmet Tatli <mehmet.tatli@lazersafe.com>

Subject: RE: [rt.lazersafe.com.au #10894] FW: Lazer safe PCSS com. error (I need help please!)

Merhaba Mehmet Bey,

Teşekkürler. Konu için müşteriye PCSS'i tamire göndermesini yada yenisi ile değişmesini önereceğim. Konuyu kapatabilirsiniz.

Best Regards,

----Original Message-----

From: Mehmet Tatli via RT [mailto:customerservice@lazersafe.com.au]

Sent: Monday, October 07, 2019 12:12 PM

To: ALI EVCI; SERVICE

Subject: RE: [rt.lazersafe.com.au #10894] FW: Lazer safe PCSS com. error (I need help please!)

Ali bey merhaba,

Email için teşekkürler.

Ekteki kod açıklamasına göre kernel yazılımını güncelleştirmeği denemek yapabileceğiniz tek ve son şey gibi görünüyor.

Fotolardan anladığım kadarıyla koruma sistemi LZS-004 HS(Çift Lazer), öyle ise ekteki kernel versiyonunu(Fx17700) yüklemeği deneyebilirsiniz.

Eğer işe yaramazsa PCSS'in tamire gitmesi(edilebileceğinin garantisi yok) ya da yenisi ile değiştirilmesi gerekmektedir.

Isagraf uygulama ismine(PCSS programı) ihtiyaç olacak her durumda, umarım kaydı vardır.

Regards Mehmet TATLI Customer Service

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Malaga, WA 6090
Australia
T +61 8 9249 4388
F +61 8 9249 6011
M +90 532 566 6879
E mehmet.tatli@lazersafe.com
Follow Us:

----Original Message----

From: ALI EVCI via RT <customerservice@lazersafe.com.au>

Sent: Monday, October 7, 2019 11:56 AM

Subject: [rt.lazersafe.com.au #10894] FW: Lazer safe PCSS com. error (I need help please!)

Hello,

Communication error appears at one of our 2007 pressbrake with Lazersafe PCSS and the code on PCSS dsplay is 2209. As far as we understand from the condition codes, this is "internal fault detected "error. Is there anything else that can be done other than replacing PCSS? The machine is in America.

Best Regards, [imza]

From: Mehmet Tatli [mailto:mehmet.tatli@lazersafe.com]

Sent: Monday, October 07, 2019 8:31 AM

To: ALI EVCI Cc: SERVICE

Subject: RE: Lazer safe PCSS com. error (I need help please!)

Ali bey günaydın,

Emaili customerservice@lazersafe.com<mailto:customerservice@lazersafe.com>adresine göndermenizi rica ediyorum.

Regards

Mehmet TATLI Customer Service

Lazer Safe Pty Ltd 27 Action Road Malaga, WA 6090

Australia

T +61 8 9249 4388 F +61 8 9249 6011 M +90 532 566 6879

E mehmet.tatli@lazersafe.com<mailto:mehmet.tatli@lazersafe.com>

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[cid:image004.png@01D31FEB.80272120]<http://www.lazersafe.com/>

[cid:image005.png@01D31FEB.80272120]http://www.lazersafe.com/

[cid:image008.png@01D57CE9.7C452C70] [signature_1449061529]

From: ALI EVCI <ali.evci@ermaksan.com.tr<mailto:ali.evci@ermaksan.com.tr>>

Sent: Friday, October 4, 2019 5:14 PM

To: Mehmet Tatli <mehmet.tatli@lazersafe.com<mailto:mehmet.tatli@lazersafe.com>>

Cc: SERVICE <service@ermaksan.com.tr<mailto:service@ermaksan.com.tr>>

Subject: FW: Lazer safe PCSS com. error (I need help please!)

Mehmet Bey merhaba,

2007 model Lazersafe'li bir makinamızda Lazersafe communitication error hatası üzerine müşteriye PCSS 'i kontrol ettirdiğimizde PCSS displayinde 2209 hatası okuyoruz. Condition code lardan anladığımız kadarı ile "internal fault detected" hatası. PCSS'i değiştirmekten başka yapılabilcek bir şey varmıdır? Makine Amerika'da.

Best Regards,

[imza]

From:

mmenard@internationalcontainerco.com<mailto:mmenard@internationalcontainerco.com>
[mailto:mmenard@internationalcontainerco.com]

Sent: Friday, October 04, 2019 5:05 PM

To: ALI EVCI

Subject: RE: Lazer safe PCSS com. error (I need help please!)

The code I am getting is 2209

Thank You

Mike

----Original Message----

From: "ALI EVCI" <ali.evci@ermaksan.com.tr<mailto:ali.evci@ermaksan.com.tr>>

Sent: Friday, October 4, 2019 9:45am

To: "mmenard@internationalcontainerco.com<mailto:mmenard@internationalcontainerco.com>" <mmenard@internationalcontainerco.com<mailto:mmenard@internationalcontainerco.com>>

Cc: "SERVICE" <service@ermaksan.com.tr<mailto:service@ermaksan.com.tr>>

Subject: RE: Lazer safe PCSS com. error (I need help please!)

This feature differs according to operating mode, key position, indexation, manual page, automatic page. So, i could not say an excat info on this. If, you are doubt about Lazersafe system, you can check the code appearing on Lazersafe PCSS unit inside electrical cabinet. And again i advise you to check the communication cable between CNC and Lazersafe unit.

Best Regards,

[imza]

From:

mmenard@internationalcontainerco.com<mailto:mmenard@internationalcontainerco.com>

[mailto:mmenard@internationalcontainerco.com]

Sent: Friday, October 04, 2019 4:11 PM

To: ALI EVCI

Subject: RE: Lazer safe PCSS com. error (I need help please!)

The laser to the front light curtain is not on. should that be on right when the interface comes on or does it come on only when you press the test button and start?

Thank You

Mike

----Original Message-----

From: "ALI EVCI" <ali.evci@ermaksan.com.tr<mailto:ali.evci@ermaksan.com.tr>>

Sent: Friday, October 4, 2019 1:54am

To: "mmenard@internationalcontainerco.com<mailto:mmenard@internationalcontainerco.com>"

 $<\!mmen ard@international container co.com<\!mailto:mmen ard@international container co.com>>>$

Cc: "SENOL RODOPLU" <s.rodoplu@ermakusa.com<mailto:s.rodoplu@ermakusa.com>>,

"SERVICE" <service@ermaksan.com.tr<mailto:service@ermaksan.com.tr>>, "AHMET MEKIK"

<ahmet.mekik@ermaksan.com.tr<mailto:ahmet.mekik@ermaksan.com.tr>>,

"HULYA YILMAZ" <h.yilmaz@ermakusa.com<mailto:h.yilmaz@ermakusa.com>>

Subject: RE: Lazer safe PCSS com. error (I need help please!) Hello,

This error can be occured because of cable between controller and Lazersafe unit. It might me loosed.

Best Regards,

[imza]

From: HULYA YILMAZ

Sent: Thursday, October 03, 2019 5:54 PM To: UFUK KOCAEL; AHMET MEKIK; ALI EVCI

Cc: SENOL RODOPLU

Subject: FW: Lazer safe PCSS com. error (I need help please!)

Merhabalar,

Asagidaki sorunla ilgili yardimci olabilir misiniz?

Saygilarimla,

"Excellence in Fab Equipment Sales and Service"

[download]<http://www.ermakusa.com/usa/>

From:

mmenard@internationalcontainerco.com<mailto:mmenard@internationalcontainerco.com> <mmenard@internationalcontainerco.com<mailto:mmenard@internationalcontainerco.com>>

Sent: Thursday, October 3, 2019 9:43 AM

To: HULYA YILMAZ <h.yilmaz@ermakusa.com<mailto:h.yilmaz@ermakusa.com>>

Subject: Lazer safe PCSS com. error (I need help please!)

Good Morning,

I'm having an issue with my Ermak Pressbrake.

SN20071136

CNC SAP 12' X 220"

Brake ran fine this Morning and then the error message came up.

(D3156: LazerSafe PCSS communication error) Please, Can you give me some guidance on how to fix this issue? Im under the gun here and I need this machine up and running ASAP.

Thank You For your assistance

Michael menard International Container Co. 110 North Bridge St., Holyoke , Mass 01089 P: 1-413-246-7503 From: Ken Searles «ksearles@internationalcontainerco.com»

Sent: Friday, October 25, 2019 6:02 PM

To: HULYA YILMAZ

Cc: SENOL RODOPLU; Joseph Searles; cwilson@internationalcontainerco.com;

mmenard@internationalcontainerco.com; ILKER KARAKAYA

Subject: Re: Ermaksan Brake

Hi Senol, is this part ready to ship? Please let me know ASAP. I will process payment on my end.

Sent from my iPhone

On Oct 25, 2019, at 5:27 PM, HULYA YILMAZ < h.yilmaz@ermakusa.com > wrote:

Hi Ken,

You may find attached the invoice#212 for your PO#19875. Your order can be shipped after payment is received. You can make a payment by credit card (3% processing fee applies), wire transfer or check. If you prefer paying by credit card, please complete the authorization form attached and return to us.

Best regards,

"Excellence in Fab Equipment Sales and Service"

<image001.jpg><image002.jpg>

----Original Message-----

From: SENOL RODOPLU <s.rodoplu@ermakusa.com>

Sent: Friday, October 18, 2019 12:32 PM

To: Ken Searles < ksearles@internationalcontainerco.com >; UMIT YILDIZ

<umit.yildiz@ermaksan.com.tr>; YUSUF OZTURK <yusuf.ozturk@ermaksan.com.tr>

Cc: Joseph Searles < <u>isearles@internationalcontainerco.com</u> >; <u>cwilson@internationalcontainerco.com</u>; <u>mmenard@internationalcontainerco.com</u>; ILKER KARAKAYA < <u>i.karakaya@ermakusa.com</u> >; HULYA

YILMAZ < h.yilmaz@ermakusa.com >; UFUK KOCAEL < ufuk.kocael@ermakusa.com >

Subject: Re: Ermaksan Brake

Hi Ken,

In order to expedite this process and have you help your machine up and running soonest we will provide you initially quoted unit for 6,400 + 100 +

You must do your own installation.

Please let us know if you want to proceed by sending us PO and payment for this unit so we can get it out to you as soon as possible.

Senol Rodoplu VP of Sales ERMAKUSA Cell: +1 630-512-7604

On 10/16/19, 11:43 AM, "Ken Searles" < ksearles@internationalcontainerco.com > wrote:

Hi Senol, here is the information we gathered from a company that works with Laser Safe.

----Original Message-----

From: "mmenard@internationalcontainerco.com" <mmenard@internationalcontainerco.com>

Sent: Wednesday, October 9, 2019 12:59pm

To: "kenco.com" <ksearles@internationalcontainerco.com>

Subject: FW: RE: Piece of shit brake

----Original Message-----

From: "Gary Holdson" < Gary@thcollc.com> Sent: Wednesday, October 9, 2019 12:16pm

To: "mmenard@internationalcontainerco.com" <mmenard@internationalcontainerco.com>

Cc: "Jeff Tannehill" < jeff@guardomation.com>

Michael,

Yes but I needed to chase down my partner as I wanted to reduce our margin on this, which he agreed to. The PCSS-F1 has been discontinued for many years now. Lazersafe is still in a position to offer you options. Most press brake manufacturers which use Lazersafe have developed a conversion package to the new PCSS-A platform which is fairly economical. Unfortunately Ermaksin isn't one of them. Below is a copy of the Email I received from Lazersafe outlining the options.

OPTION 1 - Replacement

We can still supply the PCSS-F1 model (normal lead time is about two weeks). Your price is as follows;

Product code: 0013000700

Description: PCSS-F1 w/guard counter

Price: \$5,990.00 EXW

There is an additional fee of \$260.00 to load the Ermak specific application program (assuming we can get it).

If the customer's system has the 2209 / A201 codes, then the application program would not be running so they would not be able to get the program name off the PCSS-F display. In this case, we need to contact Ermaksan to see if they have a record of the version for their machine, or we need to spend time trying to match up the machine schematics with a range or Ermak applications to see if we can find a match.

What we will need is;

Photo of the machine ID plate to show the model and serial number.

Copy of the machine electrical drawings.

A few photos of the machine and the inside of the electrical cabinet. We also need a photo of the CNC to identify the make and model.

```
OPTION 2 - Repair
```

We can get the faulty unit back to Perth for evaluation to see if it can be repaired (and what the cost would be). A minimum assessment fee of USD 160.00 would apply (plus shipping costs). The normal lead time is 4-6 weeks plus shipping.

As with option 1, we would need to identify and get a copy of the Ermak application program so it can be loaded into the unit after repair and testing is complete.

Please feel free to contact us with any questions you may have. We would need a hard copy PO or a credit card number to arrange pickup of your unit.

Best Regards, Gary Holdson THCO LLC. 423-736-1201 gary@thcollc.com

From: mmenard@internationalcontainerco.com < mmenard@internationalcontainerco.com >

Sent: Wednesday, October 9, 2019 10:35 AM

To: Gary Holdson < Gary@thcollc.com>

Subject: Re: Piece of shit brake

Good Morning Gary, Have you heard anything about the PCSS?

----Original Message-----

From: "Gary Holdson" <Gary@thcollc.com>

Sent: Monday, October 7, 2019 9:45am

To: "mmenard@internationalcontainerco.com"

<(mmenard@internationalcontainerco.com)(mailto:mmenard@internationalcontainerco.com)>

Subject: Re: Piece of shit brake

Good Morning Michael,

I spoke with Lazersafe. I need you to look at the PCSS unit and see if there is any serial number tag or a bar code on it. If not get me a photo of the unit. There were a few variations of the F model.

Best Regards,

Gary Holdson

THCO LLC

423-736-1201

 $From: [\ mmenard@international container co.com\] (\ mailto: mmenard@international container co.com\)$

<mmenard@internationalcontainerco.com>

Sent: Friday, October 4, 2019 3:01:39 PM

To: Gary Holdson <Gary@thcollc.com>

Subject: Piece of shit brake

So, here is what I have
Ermak press brake
PCSS F
code on the lazersafe module inside the cabinet on (channel 1 is 2209) & on (channel 2 is A201)
I think you said external ram test fail.
Thank you very much for your help.
Michael Menard
110 North Bridge street Holyoke mass, 01040
International Container Company

<International Container Company 212.pdf>

<Credit Card Authorization Form.pdf>

From: UMIT YILDIZ via RT <customerservice@lazersafe.com.au>

Sent: Tuesday, October 15, 2019 1:33 AM

To: ALI EVCI; SERVICE

Subject: RE: [rt.lazersafe.com.au #10894] FW: Lazer safe PCSS com. error (I need help please!)

Mehmet Bey merhaba;

Teklifiniz için teşekkür ederiz ancak ürün fiyatı çok pahalı. Bunun yerine güncel ürün bağlantısı yapılamaz mı ? bilgi verebilir misiniz ?

Best regards.

-----Original Message-----

From: Mehmet Tatli [mailto:mehmet.tatli@lazersafe.com]

Sent: Monday, October 14, 2019 7:07 PM

To: Customer Service (Lazersafe) <csresponder@lazersafe.com>

Cc: UMIT YILDIZ <umit.yildiz@ermaksan.com.tr>; YEDEK_PARCA <sparepart@ermaksan.com.tr> Subject: RE: [rt.lazersafe.com.au #10894] FW: Lazer safe PCSS com. error (I need help please!)

Ümit bey merhaba,

1, Talep etmiş olduğunuz ürün için sipariş kodu, açıklama ve fiyat bilgisi aşağıdaki gibidir;

0013000700 --- PCSS-F IO01 w/Guard Counter 1 --- 3378.00 EURO

2, Arızalı PCSS'teki Isagraf Uygulama(PCSS programı) ismini biliyor musunuz? PCSS'e program yüklemesini kim yapacak? Eğer Lazer Safe yapacaksa, programın bir kopyasının(.pia formatında) sipariş ile beraber gönderilmesi gerekiyor. Yükleme ücreti için de sipariş kodu, açıklama ve ücret aşağıdaki gibidir;

ISAGRAF001 --- IsaGRAF loading charge --- 135.00 EURO

3, Ürünün gideceği adresi belirtirseniz fiyat sorabilirim, ancak daha önce de belirttiğimiz üzere ürünün gerçek fiyatı fatura üzerinde görünecektir, bilginiz olsun.

Regards

Mehmet TATLI

Customer Service

Lazer Safe Pty Ltd 27 Action Road Malaga, WA 6090 Australia

T +61 8 9249 4388

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M +90 532 566 6879

E mehmet.tatli@lazersafe.com

Case 3:23-cv-30016-MGM Document 108-1 Filed 11/26/25 Page 147 of 189

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From: UMIT YILDIZ <umit.yildiz@ermaksan.com.tr>

Sent: Monday, October 14, 2019 3:47 PM

To: Mehmet Tatli <mehmet.tatli@lazersafe.com> Cc: YEDEK_PARCA <sparepart@ermaksan.com.tr>

Subject: FW: Lazer safe PCSS com. error (I need help please!)

Mehmet Bey merhaba;

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Best regards.

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Sent: Monday, October 7, 2019 1:34 PM

To: Mehmet Tatli <mehmet.tatli@lazersafe.com>

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Merhaba Mehmet Bey,

Teşekkürler. Konu için müşteriye PCSS'i tamire göndermesini yada yenisi ile değişmesini önereceğim. Konuyu kapatabilirsiniz.

Best Regards,

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From: Mehmet Tatli via RT [mailto:customerservice@lazersafe.com.au]

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To: ALI EVCI; SERVICE

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Ali bey merhaba,

Email için teşekkürler.

Ekteki kod açıklamasına göre kernel yazılımını güncelleştirmeği denemek yapabileceğiniz tek ve son şey gibi görünüyor.

Fotolardan anladığım kadarıyla koruma sistemi LZS-004 HS(Çift Lazer), öyle ise ekteki kernel versiyonunu(Fx17700) yüklemeği deneyebilirsiniz.

Eğer işe yaramazsa PCSS'in tamire gitmesi(edilebileceğinin garantisi yok) ya da yenisi ile değiştirilmesi gerekmektedir.

Isagraf uygulama ismine(PCSS programı) ihtiyaç olacak her durumda, umarım kaydı vardır.

Regards Mehmet TATLI

Customer Service

Lazer Safe Pty Ltd 27 Action Road Malaga, WA 6090 Australia T +61 8 9249 4388 F +61 8 9249 6011 M +90 532 566 6879 E mehmet.tatli@lazersafe.com Follow Us:

----Original Message----

From: ALI EVCI via RT <customerservice@lazersafe.com.au>

Sent: Monday, October 7, 2019 11:56 AM

Subject: [rt.lazersafe.com.au #10894] FW: Lazer safe PCSS com. error (I need help please!)

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Best Regards, [imza]

From: Mehmet Tatli [mailto:mehmet.tatli@lazersafe.com]

Sent: Monday, October 07, 2019 8:31 AM

To: ALI EVCI Cc: SERVICE

Subject: RE: Lazer safe PCSS com. error (I need help please!)

Ali bey günaydın,

Emaili customerservice@lazersafe.com<mailto:customerservice@lazersafe.com> adresine göndermenizi rica ediyorum.

Regards

Mehmet TATLI
Customer Service

Lazer Safe Pty Ltd 27 Action Road Malaga, WA 6090 Australia

T +61 8 9249 4388 F +61 8 9249 6011 M +90 532 566 6879

E mehmet.tatli@lazersafe.com<mailto:mehmet.tatli@lazersafe.com>

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[cid:image001.png@01D31FEB.80272120]<https://twitter.com/lazersafe> [cid:image002.png@01D31FEB.80272120]<http://www.linkedin.com/company/lazer-safe-pty-ltd> [cid:image003.png@01D31FEB.80272120]<https://www.youtube.com/user/lazersafe>

[cid:image004.png@01D31FEB.80272120]<http://www.lazersafe.com/>

[cid:image005.png@01D31FEB.80272120]http://www.lazersafe.com/

[cid:image008.png@01D57CE9.7C452C70] [signature_1449061529]

From: ALI EVCI <ali.evci@ermaksan.com.tr<mailto:ali.evci@ermaksan.com.tr>>

Sent: Friday, October 4, 2019 5:14 PM

To: Mehmet Tatli <mehmet.tatli@lazersafe.com<mailto:mehmet.tatli@lazersafe.com>>

Cc: SERVICE <service@ermaksan.com.tr<mailto:service@ermaksan.com.tr>>

Subject: FW: Lazer safe PCSS com. error (I need help please!)

Mehmet Bey merhaba,

2007 model Lazersafe'li bir makinamızda Lazersafe communitication error hatası üzerine müşteriye PCSS 'i kontrol ettirdiğimizde PCSS displayinde 2209 hatası okuyoruz. Condition code lardan anladığımız kadarı ile "internal fault detected" hatası. PCSS'i değiştirmekten başka yapılabilcek bir şey varmıdır? Makine Amerika'da.

Best Regards,

[imza]

From: mmenard@internationalcontainerco.com<mailto:mmenard@internationalcontainerco.com>

[mailto:mmenard@internationalcontainerco.com]

Sent: Friday, October 04, 2019 5:05 PM

To: ALI EVCI

Subject: RE: Lazer safe PCSS com. error (I need help please!)

The code I am getting is 2209

Thank You

Mike

----Original Message----

From: "ALI EVCI" <ali.evci@ermaksan.com.tr<mailto:ali.evci@ermaksan.com.tr>>

Sent: Friday, October 4, 2019 9:45am

To: "mmenard@internationalcontainerco.com<mailto:mmenard@internationalcontainerco.com>" <mmenard@internationalcontainerco.com<mailto:mmenard@internationalcontainerco.com>>

Cc: "SERVICE" <service@ermaksan.com.tr<mailto:service@ermaksan.com.tr>>

Subject: RE: Lazer safe PCSS com. error (I need help please!)

This feature differs according to operating mode, key position, indexation, manual page, automatic page. So, i could not say an excat info on this. If, you are doubt about Lazersafe system, you can check the code appearing on Lazersafe PCSS unit inside electrical cabinet. And again i advise you to check the communication cable between CNC and Lazersafe unit.

Best Regards,

[imza]

From: mmenard@internationalcontainerco.com<mailto:mmenard@internationalcontainerco.com>

[mailto:mmenard@internationalcontainerco.com]

Sent: Friday, October 04, 2019 4:11 PM

To: ALI EVCI

Subject: RE: Lazer safe PCSS com. error (I need help please!)

The laser to the front light curtain is not on. should that be on right when the interface comes on or does it come on only when you press the test button and start?

Thank You

Mike

----Original Message----

From: "ALI EVCI" <ali.evci@ermaksan.com.tr<mailto:ali.evci@ermaksan.com.tr>>

Sent: Friday, October 4, 2019 1:54am

To: "mmenard@internationalcontainerco.com<mailto:mmenard@internationalcontainerco.com>"

<mmenard@internationalcontainerco.com<mailto:mmenard@internationalcontainerco.com>>

Cc: "SENOL RODOPLU" <s.rodoplu@ermakusa.com<mailto:s.rodoplu@ermakusa.com>>, "SERVICE"

<service@ermaksan.com.tr<mailto:service@ermaksan.com.tr>>, "AHMET MEKIK"

<ahmet.mekik@ermaksan.com.tr<mailto:ahmet.mekik@ermaksan.com.tr>>, "HULYA YILMAZ"

<h.yilmaz@ermakusa.com<mailto:h.yilmaz@ermakusa.com>>

Subject: RE: Lazer safe PCSS com. error (I need help please!) Hello,

This error can be occured because of cable between controller and Lazersafe unit. It might me loosed.

Best Regards,

[imza]

From: HULYA YILMAZ

Sent: Thursday, October 03, 2019 5:54 PM To: UFUK KOCAEL; AHMET MEKIK; ALI EVCI

Cc: SENOL RODOPLU

Subject: FW: Lazer safe PCSS com. error (I need help please!)

Merhabalar,

Asagidaki sorunla ilgili yardimci olabilir misiniz?

Saygilarimla,

"Excellence in Fab Equipment Sales and Service"

[download]<http://www.ermakusa.com/usa/>

From: mmenard@internationalcontainerco.com<mailto:mmenard@internationalcontainerco.com> <mmenard@internationalcontainerco.com<mailto:mmenard@internationalcontainerco.com>>

Sent: Thursday, October 3, 2019 9:43 AM

To: HULYA YILMAZ <h.yilmaz@ermakusa.com<mailto:h.yilmaz@ermakusa.com>>

Subject: Lazer safe PCSS com. error (I need help please!)

Good Morning,

I'm having an issue with my Ermak Pressbrake.

SN20071136

CNC SAP 12' X 220"

Brake ran fine this Morning and then the error message came up.

(D3156 : LazerSafe PCSS communication error) Please, Can you give me some guidance on how to fix this issue?

Im under the gun here and I need this machine up and running ASAP.

Thank You For your assistance

Michael menard International Container Co. 110 North Bridge St., Holyoke , Mass 01089 P: 1-413-246-7503 From: ALI EVCI via RT <customerservice@lazersafe.com.au>

Sent: Tuesday, October 15, 2019 1:12 AM

To: SERVICE

Subject: FW: [rt.lazersafe.com.au #10894] FW: Lazer safe PCSS com. error (I need help please!)

Ufuk Abi Merhaba,

Amerika'daki Lazersafe sıkıntısı olan 2007 model makine için Lazersafe PCSS-F siparişi yapılacak ancak programına ihtiyaç vardır. Bu makinadaki program kayıtlarımızda yok. Altta Mehmet Bey'in dediğini orada yapabilirmisiniz ya da yaptırabilrimisiniz? Bu sayede PCSS içindeki programın ismini görelim ve yenisine yükleyelim.

Best Regards,

-----Original Message-----

From: Mehmet Tatli via RT [mailto:customerservice@lazersafe.com.au]

Sent: Tuesday, October 15, 2019 9:02 AM

To: ALI EVCI; SERVICE

Subject: RE: [rt.lazersafe.com.au #10894] FW: Lazer safe PCSS com. error (I need help please!)

Ali bey günaydın,

Arızalı olan PCSS'e kernel ve isagraf yüklemeği deneyebilecek kimse yok mu Amerika'da?

Regards

Mehmet TATLI

Customer Service

Lazer Safe Pty Ltd

27 Action Road

Malaga, WA 6090

Australia

T+61 8 9249 4388

F +61 8 9249 6011

M +90 532 566 6879

E mehmet.tatli@lazersafe.com

Follow Us:

----Original Message----

From: ALI EVCI via RT <customerservice@lazersafe.com.au>

Sent: Tuesday, October 15, 2019 8:43 AM

To: Mehmet Tatli <mehmet.tatli@lazersafe.com>

Subject: RE: [rt.lazersafe.com.au #10894] FW: Lazer safe PCSS com. error (I need help please!)

Case 3:23-cv-30016-MGM Document 108-1 Filed 11/26/25 Page 153 of 189

Tue Oct 15 13:42:54 2019: Request 10894 was acted upon.

Transaction: Correspondence added by ali.evci@ermaksan.com.tr

Queue: Ermaksan

Subject: RE: [rt.lazersafe.com.au #10894] FW: Lazer safe PCSS com. error (I need help please!)

Owner: mehmett

Requestors: ali.evci@ermaksan.com.tr, service@ermaksan.com.tr

Status: open

Ticket < URL: http://per-srv-rt1.lazersafe.com.au/Ticket/Display.html?id=10894 >

Mehmet Bey Merhaba,

Sipariş durumunda direk adrese yönlendireceğimizden yüklemenin yapılıp gönderilmesini tercih ediyoruz ancak program konusunda yardımınıza ihtiyacımız var çünkü kayıtlarımızda hangi programın yüklü olduğu mevcut değil. Onu bulmak için yardımcı olabilir misiniz? Makinanın üzerindeki PCSS fotosu, makine parametreleri ve projesini ekliyorum.

Muhtemel gönderi adresi;

ErmakUSA Inc.

2860 S River Rd, Suite 145, Des Plaines,IL 60018 USA

Best Regards,

----Original Message----

From: Mehmet Tatli via RT [mailto:customerservice@lazersafe.com.au]

Sent: Monday, October 14, 2019 7:07 PM

To: ALI EVCI; SERVICE

Subject: RE: [rt.lazersafe.com.au #10894] FW: Lazer safe PCSS com. error (I need help please!)

Ümit bey merhaba,

1, Talep etmiş olduğunuz ürün için sipariş kodu, açıklama ve fiyat bilgisi aşağıdaki gibidir;

0013000700 --- PCSS-F IO01 w/Guard Counter 1 --- 3378.00 EURO

2, Arızalı PCSS'teki Isagraf Uygulama(PCSS programı) ismini biliyor musunuz? PCSS'e program yüklemesini kim yapacak? Eğer Lazer Safe yapacaksa, programın bir kopyasının(.pia formatında) sipariş ile beraber gönderilmesi gerekiyor. Yükleme ücreti için de sipariş kodu, açıklama ve ücret aşağıdaki gibidir;

ISAGRAF001 --- IsaGRAF loading charge --- 135.00 EURO

3, Ürünün gideceği adresi belirtirseniz fiyat sorabilirim, ancak daha önce de belirttiğimiz üzere ürünün gerçek fiyatı fatura üzerinde görünecektir, bilginiz olsun.

Regards Mehmet TATLI Customer Service

Lazer Safe Pty Ltd
27 Action Road
Malaga, WA 6090
Australia
T +61 8 9249 4388
F +61 8 9249 6011
M +90 532 566 6879
E mehmet.tatli@lazersafe.com
Follow Us:

From: UMIT YILDIZ <umit.yildiz@ermaksan.com.tr>

Sent: Monday, October 14, 2019 3:47 PM

To: Mehmet Tatli <mehmet.tatli@lazersafe.com> Cc: YEDEK_PARCA <sparepart@ermaksan.com.tr>

Subject: FW: Lazer safe PCSS com. error (I need help please!)

Mehmet Bey merhaba;

Ekteki PCSS için Teklif iletebilir misiniz ? Ürün Amerika ya gidecek mümkünse nakliye fiyatını da iletmenizi rica ederim.

Best regards.

----Original Message-----

From: ALI EVCI via RT <customerservice@lazersafe.com.au>

Sent: Monday, October 7, 2019 1:34 PM

To: Mehmet Tatli <mehmet.tatli@lazersafe.com>

Subject: RE: [rt.lazersafe.com.au #10894] FW: Lazer safe PCSS com. error (I need help please!)

Merhaba Mehmet Bey,

Teşekkürler. Konu için müşteriye PCSS'i tamire göndermesini yada yenisi ile değişmesini önereceğim. Konuyu kapatabilirsiniz.

Best Regards,

----Original Message-----

From: Mehmet Tatli via RT [mailto:customerservice@lazersafe.com.au]

Sent: Monday, October 07, 2019 12:12 PM

To: ALI EVCI; SERVICE

Subject: RE: [rt.lazersafe.com.au #10894] FW: Lazer safe PCSS com. error (I need help please!)

Ali bey merhaba,

Email için teşekkürler.

Ekteki kod açıklamasına göre kernel yazılımını güncelleştirmeği denemek yapabileceğiniz tek ve son şey gibi görünüyor.

Fotolardan anladığım kadarıyla koruma sistemi LZS-004 HS(Çift Lazer), öyle ise ekteki kernel versiyonunu(Fx17700) yüklemeği deneyebilirsiniz.

Eğer işe yaramazsa PCSS'in tamire gitmesi(edilebileceğinin garantisi yok) ya da yenisi ile değiştirilmesi gerekmektedir.

Isagraf uygulama ismine(PCSS programı) ihtiyaç olacak her durumda, umarım kaydı vardır.

Regards Mehmet TATLI Customer Service

Lazer Safe Pty Ltd
27 Action Road
Malaga, WA 6090
Australia
T +61 8 9249 4388
F +61 8 9249 6011
M +90 532 566 6879
E mehmet.tatli@lazersafe.com
Follow Us:

----Original Message-----

From: ALI EVCI via RT <customerservice@lazersafe.com.au>

Sent: Monday, October 7, 2019 11:56 AM

Subject: [rt.lazersafe.com.au #10894] FW: Lazer safe PCSS com. error (I need help please!)

Hello,

Communication error appears at one of our 2007 pressbrake with Lazersafe PCSS and the code on PCSS dsplay is 2209. As far as we understand from the condition codes, this is "internal fault detected "error. Is there anything else that can be done other than replacing PCSS? The machine is in America.

Best Regards, [imza]

From: Mehmet Tatli [mailto:mehmet.tatli@lazersafe.com]

Sent: Monday, October 07, 2019 8:31 AM

To: ALI EVCI Cc: SERVICE

Subject: RE: Lazer safe PCSS com. error (I need help please!)

Ali bey günaydın,

Emaili customerservice@lazersafe.com<mailto:customerservice@lazersafe.com> adresine göndermenizi rica ediyorum.

Regards

Mehmet TATLI Customer Service

Lazer Safe Pty Ltd 27 Action Road Malaga, WA 6090 Australia

T +61 8 9249 4388 F +61 8 9249 6011 M +90 532 566 6879

E mehmet.tatli@lazersafe.com<mailto:mehmet.tatli@lazersafe.com>

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[cid:image001.png@01D31FEB.80272120]<https://twitter.com/lazersafe> [cid:image002.png@01D31FEB.80272120]<http://www.linkedin.com/company/lazer-safe-pty-ltd> [cid:image003.png@01D31FEB.80272120]<https://www.youtube.com/user/lazersafe>

[cid:image004.png@01D31FEB.80272120]<http://www.lazersafe.com/>

[cid:image005.png@01D31FEB.80272120]<http://www.lazersafe.com/>

[cid:image008.png@01D57CE9.7C452C70] [signature_1449061529]

From: ALI EVCI <ali.evci@ermaksan.com.tr<mailto:ali.evci@ermaksan.com.tr>>

Sent: Friday, October 4, 2019 5:14 PM

To: Mehmet Tatli <mehmet.tatli@lazersafe.com<mailto:mehmet.tatli@lazersafe.com>>

Cc: SERVICE <service@ermaksan.com.tr<mailto:service@ermaksan.com.tr>>

Subject: FW: Lazer safe PCSS com. error (I need help please!)

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2007 model Lazersafe'li bir makinamızda Lazersafe communitication error hatası üzerine müşteriye PCSS 'i kontrol ettirdiğimizde PCSS displayinde 2209 hatası okuyoruz. Condition code lardan anladığımız kadarı ile "internal fault detected" hatası. PCSS'i değiştirmekten başka yapılabilcek bir şey varmıdır? Makine Amerika'da.

Best Regards,

[imza]

From: mmenard@internationalcontainerco.com<mailto:mmenard@internationalcontainerco.com>

[mailto:mmenard@internationalcontainerco.com]

Sent: Friday, October 04, 2019 5:05 PM

To: ALI EVCI

Subject: RE: Lazer safe PCSS com. error (I need help please!)

The code I am getting is 2209

Case 3:23-cv-30016-MGM Document 108-1 Filed 11/26/25 Page 157 of 189

Thank You

Mike

----Original Message----

From: "ALI EVCI" <ali.evci@ermaksan.com.tr<mailto:ali.evci@ermaksan.com.tr>>

Sent: Friday, October 4, 2019 9:45am

To: "mmenard@internationalcontainerco.com<mailto:mmenard@internationalcontainerco.com>" <mmenard@internationalcontainerco.com<mailto:mmenard@internationalcontainerco.com>>

Cc: "SERVICE" <service@ermaksan.com.tr<mailto:service@ermaksan.com.tr>>

Subject: RE: Lazer safe PCSS com. error (I need help please!)

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[imza]

From: mmenard@internationalcontainerco.com<mailto:mmenard@internationalcontainerco.com>

[mailto:mmenard@internationalcontainerco.com]

Sent: Friday, October 04, 2019 4:11 PM

To: ALI EVCI

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The laser to the front light curtain is not on. should that be on right when the interface comes on or does it come on only when you press the test button and start?

Thank You

Mike

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From: "ALI EVCI" <ali.evci@ermaksan.com.tr<mailto:ali.evci@ermaksan.com.tr>>

Sent: Friday, October 4, 2019 1:54am

To: "mmenard@international container co.com < mailto: mmenard@international container co.com > "all the co.com > "all the co.com > "all

<mmenard@internationalcontainerco.com</p>

Cc: "SENOL RODOPLU" <s.rodoplu@ermakusa.com<mailto:s.rodoplu@ermakusa.com>>, "SERVICE"

<service@ermaksan.com.tr<mailto:service@ermaksan.com.tr>>, "AHMET MEKIK"

<ahmet.mekik@ermaksan.com.tr<mailto:ahmet.mekik@ermaksan.com.tr>>, "HULYA YILMAZ"

<h.yilmaz@ermakusa.com<mailto:h.yilmaz@ermakusa.com>>

Subject: RE: Lazer safe PCSS com. error (I need help please!) Hello,

This error can be occured because of cable between controller and Lazersafe unit. It might me loosed.

Best Regards,

[imza]

From: HULYA YILMAZ

Sent: Thursday, October 03, 2019 5:54 PM

To: UFUK KOCAEL; AHMET MEKIK; ALI EVCI

Cc: SENOL RODOPLU

Subject: FW: Lazer safe PCSS com. error (I need help please!)

Merhabalar,

Asagidaki sorunla ilgili yardimci olabilir misiniz?

Saygilarimla,

"Excellence in Fab Equipment Sales and Service"

[download]<http://www.ermakusa.com/usa/>

From: mmenard@internationalcontainerco.com<mailto:mmenard@internationalcontainerco.com> <mmenard@internationalcontainerco.com<mailto:mmenard@internationalcontainerco.com>>

Sent: Thursday, October 3, 2019 9:43 AM

To: HULYA YILMAZ <h.yilmaz@ermakusa.com<mailto:h.yilmaz@ermakusa.com>>

Subject: Lazer safe PCSS com. error (I need help please!)

Good Morning,

I'm having an issue with my Ermak Pressbrake.

SN20071136

CNC SAP 12' X 220"

Brake ran fine this Morning and then the error message came up.

(D3156: LazerSafe PCSS communication error) Please, Can you give me some guidance on how to fix this issue? Im under the gun here and I need this machine up and running ASAP.

Thank You For your assistance

Michael menard International Container Co. 110 North Bridge St., Holyoke , Mass 01089 P: 1-413-246-7503 **From:** mmenard@internationalcontainerco.com **Sent:** Monday, October 7, 2019 8:15 AM

To: ALI EVCI

Subject: RE: Lazer safe PCSS com. error (I need help please!)

Good Morning,

Turns out that I need a new PCSS F. Does this module need to Come from Ermak or can I buy a duplicate module from somewhere close to me to get my machine up and running faster?

Thank You

Mike

-----Original Message-----

From: "ALI EVCI" <ali.evci@ermaksan.com.tr>

Sent: Friday, October 4, 2019 1:54am

To: "mmenard@internationalcontainerco.com" <mmenard@internationalcontainerco.com>

Cc: "SENOL RODOPLU" <s.rodoplu@ermakusa.com>, "SERVICE" <service@ermaksan.com.tr>, "AHMET MEKIK"

<ahmet.mekik@ermaksan.com.tr>, "HULYA YILMAZ" <h.yilmaz@ermakusa.com>

Subject: RE: Lazer safe PCSS com. error (I need help please!)

Hello,

This error can be occured because of cable between controller and Lazersafe unit. It might me loosed.

Best Regards,



From: HULYA YILMAZ

Sent: Thursday, October 03, 2019 5:54 PM **To:** UFUK KOCAEL; AHMET MEKIK; ALI EVCI

Cc: SENOL RODOPLU

Subject: FW: Lazer safe PCSS com. error (I need help please!)

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Michael menard International Container Co. 110 North Bridge St., Holyoke , Mass 01089 P: 1-413-246-7503 From:ALI EVCI <a.evci@ermakusa.com>Sent:Monday, October 7, 2019 5:43 AMTo:mmenard@internationalcontainerco.com

Cc: SERVICE; HULYA YILMAZ; SENOL RODOPLU; ILKER KARAKAYA

Subject: RE: Lazer safe PCSS com. error (I need help please!)

Hello,

Lazersafe company agree with me; this PCSS unit has internal fault and need to be replaced. You may get in contact with ErmakUSA for purchase if requested.

Best Regards,



From: ALI EVCI

Sent: Friday, October 04, 2019 5:15 PM **To:** 'mmenard@internationalcontainerco.com'

Subject: RE: Lazer safe PCSS com. error (I need help please!)

2209 means internal fault in PCSS unit and most probably need to be replaced but i consult issue to Lazersafe company if anything can be done rather than replacing whole unit.

Bythe way could you send us a photo form PCSS unit inside electricak cabinet.

Best Regards,



Case 3:23-cv-30016-MGM Document 108-1 Filed 11/26/25 Page 162 of 189

From: mmenard@internationalcontainerco.com [mailto:mmenard@internationalcontainerco.com]

Sent: Friday, October 04, 2019 5:05 PM

To: ALI EVCI

Subject: RE: Lazer safe PCSS com. error (I need help please!)

The code I am getting is 2209

Thank You Mike

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Best Regards,



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Sent: Friday, October 04, 2019 4:11 PM

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To: "mmenard@internationalcontainerco.com" <mmenard@internationalcontainerco.com>

Cc: "SENOL RODOPLU" < s.rodoplu@ermakusa.com >, "SERVICE" < service@ermaksan.com.tr >, "AHMET MEKIK"

h.yilmaz@ermakusa.com>

Subject: RE: Lazer safe PCSS com. error (I need help please!)

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Best Regards,



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Sent: Thursday, October 03, 2019 5:54 PM **To:** UFUK KOCAEL; AHMET MEKIK; ALI EVCI

Cc: SENOL RODOPLU

Subject: FW: Lazer safe PCSS com. error (I need help please!)

Merhabalar,

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Saygilarimla,

"Excellence in Fab Equipment Sales and Service"



From: mmenard@internationalcontainerco.com <mmenard@internationalcontainerco.com>

Sent: Thursday, October 3, 2019 9:43 AM

To: HULYA YILMAZ < h.yilmaz@ermakusa.com >

Subject: Lazer safe PCSS com. error (I need help please!)

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SN20071136

CNC SAP 12' X 220"

Brake ran fine this Morning and then the error message came up.

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Please, Can you give me some guidance on how to fix this issue?

Im under the gun here and I need this machine up and running ASAP.

Thank You For your assistance

Michael menard International Container Co. 110 North Bridge St., Holyoke , Mass 01089 P: 1-413-246-7503 From: Mehmet Tatli <mehmet.tatli@lazersafe.com>

Sent: Monday, October 7, 2019 12:31 AM

To: ALI EVCI **Cc:** SERVICE

Subject: RE: Lazer safe PCSS com. error (I need help please!)

Follow Up Flag: Izle
Flag Status: Flagged

Ali bey günaydın,

Emaili <u>customerservice@lazersafe.com</u> adresine göndermenizi rica ediyorum.

Regards

Mehmet TATLI

Customer Service

Lazer Safe Pty Ltd27 Action Road
Malaga, WA 6090 **T** +61 8 9249 4388 **F** +61 8 9249 6011 **M** +90 532 566 6879

Australia E mehmet.tatli@lazersafe.com

Follow Us:



Performance without compr

I------







Visit us at the Laze Stand A418

From: ALI EVCI <ali.evci@ermaksan.com.tr>
Sent: Friday, October 4, 2019 5:14 PM

To: Mehmet Tatli <mehmet.tatli@lazersafe.com>

Cc: SERVICE <service@ermaksan.com.tr>

Subject: FW: Lazer safe PCSS com. error (I need help please!)

Mehmet Bey merhaba,

2007 model Lazersafe'li bir makinamızda Lazersafe communitication error hatası üzerine müşteriye PCSS 'i kontrol ettirdiğimizde PCSS displayinde 2209 hatası okuyoruz. Condition code lardan anladığımız kadarı ile "internal fault detected" hatası. PCSS'i değiştirmekten başka yapılabilcek bir şey varmıdır? Makine Amerika'da.

Best Regards,



From: mmenard@internationalcontainerco.com [mailto:mmenard@internationalcontainerco.com]

Sent: Friday, October 04, 2019 5:05 PM

To: ALI EVCI

Subject: RE: Lazer safe PCSS com. error (I need help please!)

The code I am getting is 2209

Thank You

Mike

----Original Message----

From: "ALI EVCI" <ali.evci@ermaksan.com.tr>

Sent: Friday, October 4, 2019 9:45am

To: "mmenard@internationalcontainerco.com" <mmenard@internationalcontainerco.com>

Cc: "SERVICE" < service@ermaksan.com.tr >

Subject: RE: Lazer safe PCSS com. error (I need help please!)

This feature differs according to operating mode, key position, indexation, manual page, automatic page. So, i could not say an excat info on this. If, you are doubt about Lazersafe system, you can check the code appearing on Lazersafe PCSS unit inside electrical cabinet. And again i advise you to check the communication cable between CNC and Lazersafe unit.

Best Regards,



From: mmenard@internationalcontainerco.com [mailto:mmenard@internationalcontainerco.com]

Sent: Friday, October 04, 2019 4:11 PM

To: ALI EVCI

Subject: RE: Lazer safe PCSS com. error (I need help please!)

The laser to the front light curtain is not on. should that be on right when the interface comes on or does it come on only when you press the test button and start?

Thank You

Mike

-----Original Message-----

From: "ALI EVCI" <ali.evci@ermaksan.com.tr>

Sent: Friday, October 4, 2019 1:54am

To: "mmenard@internationalcontainerco.com" <mmenard@internationalcontainerco.com>

Cc: "SENOL RODOPLU" <<u>s.rodoplu@ermakusa.com</u>>, "SERVICE" <<u>service@ermaksan.com.tr</u>>, "AHMET MEKIK"

<ahmet.mekik@ermaksan.com.tr>, "HULYA YILMAZ" <h.yilmaz@ermakusa.com>

Subject: RE: Lazer safe PCSS com. error (I need help please!)

Hello,

This error can be occured because of cable between controller and Lazersafe unit. It might me loosed.

Best Regards,



From: HULYA YILMAZ

Sent: Thursday, October 03, 2019 5:54 PM **To:** UFUK KOCAEL; AHMET MEKIK; ALI EVCI

Cc: SENOL RODOPLU

Subject: FW: Lazer safe PCSS com. error (I need help please!)

Merhabalar,

Asagidaki sorunla ilgili yardimci olabilir misiniz?

Saygilarimla,

"Excellence in Fab Equipment Sales and Service"



From: mmenard@internationalcontainerco.com <mmenard@internationalcontainerco.com>

Sent: Thursday, October 3, 2019 9:43 AM **To:** HULYA YILMAZ < h.yilmaz@ermakusa.com >

Subject: Lazer safe PCSS com. error (I need help please!)

Good Morning,

I'm having an issue with my Ermak Pressbrake.

SN20071136

CNC SAP 12' X 220"

Brake ran fine this Morning and then the error message came up.

(D3156 : LazerSafe PCSS communication error)

Please, Can you give me some guidance on how to fix this issue? Im under the gun here and I need this machine up and running ASAP.

Thank You For your assistance

Michael menard International Container Co. 110 North Bridge St., Holyoke , Mass 01089 P: 1-413-246-7503 **From:** mmenard@internationalcontainerco.com

Sent: Friday, October 4, 2019 9:05 AM

To: ALI EVCI

Subject: RE: Lazer safe PCSS com. error (I need help please!)

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Thank You Mike

-----Original Message-----

From: "ALI EVCI" <ali.evci@ermaksan.com.tr>

Sent: Friday, October 4, 2019 9:45am

To: "mmenard@internationalcontainerco.com" <mmenard@internationalcontainerco.com>

Cc: "SERVICE" <service@ermaksan.com.tr>

Subject: RE: Lazer safe PCSS com. error (I need help please!)

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Subject: RE: Lazer safe PCSS com. error (I need help please!)

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Sent: Friday, October 4, 2019 1:54am

To: "mmenard@internationalcontainerco.com" <mmenard@internationalcontainerco.com>

Cc: "SENOL RODOPLU" < s.rodoplu@ermakusa.com >, "SERVICE" < service@ermaksan.com.tr >, "AHMET MEKIK"

, "HULYA YILMAZ" < h.yilmaz@ermakusa.com>

Subject: RE: Lazer safe PCSS com. error (I need help please!)

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From: mmenard@internationalcontainerco.com <mmenard@internationalcontainerco.com>

Sent: Thursday, October 3, 2019 9:43 AM **To:** HULYA YILMAZ < h.yilmaz@ermakusa.com >

Subject: Lazer safe PCSS com. error (I need help please!)

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CNC SAP 12' X 220"

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(D3156 : LazerSafe PCSS communication error)

Please, Can you give me some guidance on how to fix this issue?

Im under the gun here and I need this machine up and running ASAP.

Thank You For your assistance

Michael menard

International Container Co.

110 North Bridge St., Holyoke , Mass 01089 P: 1-413-246-7503

From: ALI EVCI <a.evci@ermakusa.com>
Sent: Friday, October 4, 2019 12:55 AM

To: mmenard@internationalcontainerco.com

Cc: SENOL RODOPLU; SERVICE; AHMET MEKIK; HULYA YILMAZ

Subject: RE: Lazer safe PCSS com. error (I need help please!)

Hello,

This error can be occured because of cable between controller and Lazersafe unit. It might me loosed.

Best Regards,



From: HULYA YILMAZ

Sent: Thursday, October 03, 2019 5:54 PM **To:** UFUK KOCAEL; AHMET MEKIK; ALI EVCI

Cc: SENOL RODOPLU

Subject: FW: Lazer safe PCSS com. error (I need help please!)

Merhabalar,

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"Excellence in Fab Equipment Sales and Service"



From: mmenard@internationalcontainerco.com <mmenard@internationalcontainerco.com>

Sent: Thursday, October 3, 2019 9:43 AM **To:** HULYA YILMAZ <h.yilmaz@ermakusa.com>

Subject: Lazer safe PCSS com. error (I need help please!)

Good Morning, I'm having an issue with my Ermak Pressbrake. SN20071136
CNC SAP 12' X 220"
Brake ran fine this Morning and then the error message came up. (D3156: LazerSafe PCSS communication error)
Please, Can you give me some guidance on how to fix this issue?
Im under the gun here and I need this machine up and running ASAP. Thank You For your assistance

Michael menard International Container Co. 110 North Bridge St., Holyoke , Mass 01089 P: 1-413-246-7503 From:ALI EVCI <a.evci@ermakusa.com>Sent:Monday, October 7, 2019 9:29 AMTo:mmenard@internationalcontainerco.com

Cc: SERVICE; HULYA YILMAZ; SENOL RODOPLU; ILKER KARAKAYA

Subject: RE: Lazer safe PCSS com. error (I need help please!)

Hello,

New PCSS unit should be programmed according to your machine, that's why any random PCSS unit won't work.

Best Regards,



From: mmenard@internationalcontainerco.com [mailto:mmenard@internationalcontainerco.com]

Sent: Monday, October 07, 2019 4:15 PM

To: ALI EVCI

Subject: RE: Lazer safe PCSS com. error (I need help please!)

Good Morning,

Turns out that I need a new PCSS F. Does this module need to Come from Ermak or can I buy a duplicate module from somewhere close to me to get my machine up and running faster?

Thank You

Mike

-----Original Message-----

From: "ALI EVCI" <a i.evci@ermaksan.com.tr>

Sent: Friday, October 4, 2019 1:54am

To: "mmenard@internationalcontainerco.com" <mmenard@internationalcontainerco.com>

Cc: "SENOL RODOPLU" < s.rodoplu@ermakusa.com >, "SERVICE" < service@ermaksan.com.tr >, "AHMET MEKIK"

, "HULYA YILMAZ" < h.yilmaz@ermakusa.com>

Subject: RE: Lazer safe PCSS com. error (I need help please!)

Hello,

This error can be occured because of cable between controller and Lazersafe unit. It might me loosed.

Best Regards,



From: HULYA YILMAZ

Sent: Thursday, October 03, 2019 5:54 PM **To:** UFUK KOCAEL; AHMET MEKIK; ALI EVCI

Cc: SENOL RODOPLU

Subject: FW: Lazer safe PCSS com. error (I need help please!)

Merhabalar,

Asagidaki sorunla ilgili yardimci olabilir misiniz?

Saygilarimla,

"Excellence in Fab Equipment Sales and Service"



From: mmenard@internationalcontainerco.com <mmenard@internationalcontainerco.com>

Sent: Thursday, October 3, 2019 9:43 AM **To:** HULYA YILMAZ < h.yilmaz@ermakusa.com >

Subject: Lazer safe PCSS com. error (I need help please!)

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SN20071136

CNC SAP 12' X 220"

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(D3156: LazerSafe PCSS communication error)

Please, Can you give me some guidance on how to fix this issue?

Im under the gun here and I need this machine up and running ASAP.

Thank You For your assistance

Michael menard International Container Co. 110 North Bridge St., Holyoke , Mass 01089 P: 1-413-246-7503 From: SENOL RODOPLU <s.rodoplu@ermakusa.com>

Sent: Thursday, October 17, 2019 10:10 AM

To: UMIT YILDIZ; YUSUF OZTURK

Cc: UFUK KOCAEL; HULYA YILMAZ; ALI EVCI

Subject: FW: Ermaksan Brake

Attachments: RE: Ermaksan Press Brake (35.7 KB)

Arkadaslar,

INTERNATIONAL CONTAINER firmasindaki isin koruma sorunu icin ekteki teklifi gondermistiniz ve elektrik bolumu daha ucuz bir alternative icin calisiyor demistiniz.

Musteriye farkli bir firmanin yaptigi teklif asagidadir. Bizim ERMAKUSA olarak alis fiyatimizdan bile daha ucuz. Musteri parcayi onlardan alsam siz sadece programi atabilir misiniz diyor?

Veya musteriye biz bu isin korumayi sasagidaki firma ile ayni fiyata satalim baskasina kaptirmayalim musterimizi? Bu da sizin ErmakUSA'ye bunu 20% indirimle vermeniz demek, \$6,500x 0.80= \$5,200 biz de bunun uzerine 25% kay koyariz \$6,500"e musterinin isini cozeriz.

Ne dersiniz?

Senol Rodoplu VP of Sales ERMAKUSA

Cell: +1 630-512-7604

On 10/16/19, 11:43 AM, "Ken Searles" < ksearles@internationalcontainerco.com > wrote:

Hi Senol, here is the information we gathered from a company that works with Laser Safe.

-----Original Message-----

From: "mmenard@internationalcontainerco.com" <mmenard@internationalcontainerco.com>

Sent: Wednesday, October 9, 2019 12:59pm

To: "kenco.com" <ksearles@internationalcontainerco.com>

Subject: FW: RE: Piece of shit brake

----Original Message-----

From: "Gary Holdson" <Gary@thcollc.com> Sent: Wednesday, October 9, 2019 12:16pm

To: "mmenard@internationalcontainerco.com" < mmenard@internationalcontainerco.com >

Cc: "Jeff Tannehill" <jeff@guardomation.com>

Michael,

Yes but I needed to chase down my partner as I wanted to reduce our margin on this, which he agreed to. The PCSS-F1 has been discontinued for many years now. Lazersafe is still in a position to offer you options. Most press brake manufacturers which use Lazersafe have developed a conversion package to the new PCSS-A platform which is fairly economical. Unfortunately Ermaksin isn't one of them. Below is a copy of the Email I received from Lazersafe outlining the options.

OPTION 1 - Replacement

We can still supply the PCSS-F1 model (normal lead time is about two weeks). Your price is as follows;

Product code: 0013000700

Description: PCSS-F1 w/guard counter

Price: \$5,990.00 EXW

There is an additional fee of \$260.00 to load the Ermak specific application program (assuming we can get it).

If the customer's system has the 2209 / A201 codes, then the application program would not be running so they would not be able to get the program name off the PCSS-F display. In this case, we need to contact Ermaksan to see if they have a record of the version for their machine, or we need to spend time trying to match up the machine schematics with a range or Ermak applications to see if we can find a match.

What we will need is;

Photo of the machine ID plate to show the model and serial number.

Copy of the machine electrical drawings.

A few photos of the machine and the inside of the electrical cabinet. We also need a photo of the CNC to identify the make and model.

OPTION 2 - Repair

We can get the faulty unit back to Perth for evaluation to see if it can be repaired (and what the cost would be). A minimum assessment fee of USD 160.00 would apply (plus shipping costs). The normal lead time is 4-6 weeks plus shipping.

As with option 1, we would need to identify and get a copy of the Ermak application program so it can be loaded into the unit after repair and testing is complete.

Please feel free to contact us with any questions you may have. We would need a hard copy PO or a credit card number to arrange pickup of your unit.

Best Regards, Gary Holdson THCO LLC. 423-736-1201 gary@thcollc.com

From: mmenard@internationalcontainerco.com < mmenard@internationalcontainerco.com >

Sent: Wednesday, October 9, 2019 10:35 AM

To: Gary Holdson < Gary@thcollc.com>

Subject: Re: Piece of shit brake

Good Morning Gary, Have you heard anything about the PCSS?

----Original Message-----

From: "Gary Holdson" <Gary@thcollc.com>

Sent: Monday, October 7, 2019 9:45am

To: "mmenard@internationalcontainerco.com" <[

mmenard@internationalcontainerco.com](mailto:mmenard@internationalcontainerco.com)>

Subject: Re: Piece of shit brake

Good Morning Michael,

I spoke with Lazersafe. I need you to look at the PCSS unit and see if there is any serial number tag or a bar code on it. If not get me a photo of the unit. There were a few variations of the F model.

Best Regards,

Gary Holdson

THCO LLC

423-736-1201

From: mmenard@internationalcontainerco.com <mmenard@internationalcontainerco.com>

Sent: Friday, October 4, 2019 3:01:39 PM

To: Gary Holdson < Gary@thcollc.com>

Subject: Piece of shit brake

So, here is what I have Ermak press brake PCSS F

code on the lazersafe module inside the cabinet on (channel 1 is 2209) & on (channel 2 is A201)

I think you said external ram test fail.

Thank you very much for your help.

Michael Menard

110 North Bridge street Holyoke mass, 01040

International Container Company

EXHIBIT K

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UNITED STATES DISTRICT COURT

DISTRICT OF MASSACHUSETTS

C.A. No. 3:23-CV-30016

IVAN LAGUNA and MARGARITA LOPEZ,

Plaintiffs

v.

LAZER SAFE PTY, LTD.; FIESSLER ELECTRONIK

GmbH & CO. KG; ERMAK USA, INC.; ERMAKSAN

TURKEY a/k/a ERMAKSAN MAKINA SANAYI VE

TICARET A.S.; and JOHN DOE DISTRIBUTOR,

Defendants

- - - - - - - - - - x

VIDEOTAPED INTERPRETED ZOOM VIDEOCONFERENCE DEPOSITION OF UFUK KOCAEL, a witness called on behalf of the Plaintiffs pursuant to notice before Jessica L. Williamson, Registered Merit Reporter, Certified Realtime Reporter, and Notary Public in and for the Commonwealth of Massachusetts, on Tuesday, December 17, 2024, commencing at 10:06 a.m.

LONDON STENOGRAPHY LLC
P.O. Box 155
Manomet, Massachusetts 02345
londonreporter@comcast.net
774.259.0646

Page 2

```
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     Wellesley, Massachusetts 02481
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     mmascis@sullivanllp.com
     Counsel for the Plaintiffs
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     Suite 700
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     Chicago, Illinois 60654
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     ssharp@atom.law
     Counsel for the Defendants Ermak USA, Inc.
18
19
     and Ermaksan Turkey a/k/a Ermaksan Makina
20
     Sanayi Ve Ticaret A.S. and the Deponent
21
22
23
24
```

Page 3

```
APPEARANCES, Continued
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     Patricia E. Antezana, Esq.
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     Reed Smith, LLP
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     Reed Smith Center
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     225 Fifth Avenue, Suite 1200
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     Pittsburgh, Pennsylvania 15222
     (412) 288-7242
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     pantezana@reedsmith.com
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     Counsel for the Defendant Fiessler
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     (718) 309-1503
     lamonica@litchfieldcavo.com
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     Counsel for the Defendant Lazer Safe Pty
19
2.0
     Ltd.
21
22
     ALSO PRESENT:
     David Woodford, Legal Video Specialist
23
     Sefa Ozden, Interpreter
24
```

```
today's deposition?
 1
 2
          I didn't.
     Α.
          Okay. And, sir, what is your current --
 3
     Q.
          your job -- strike that.
 4
               Where do you work, sir?
 5
          Ermaksan. I'm working at Ermaksan.
     Α.
 6
 7
     Ο.
          And what -- is that a location in Turkey?
          Yes, it's located in Turkey.
 8
     Α.
          How long have you worked for Ermaksan?
 9
     Ο.
          For 22 years.
10
     Α.
          What is your title there?
11
     Ο.
          Service technician.
12
     Α.
13
          And as part of your duties as service
     Ο.
          technician, do you travel to customers of
14
          Ermaksan?
15
16
     Α.
          I don't do it myself. Ermaksan does it, so
          they -- they just tell the branches where
17
          there needs to be work done, and then
18
          whoever is provided for this job, then
19
          Ermaksan send them directly.
20
                   THE WITNESS: Ermak USA.
21
          There is a -- there is a branch in the
22
     Α.
          United States for Ermaksan, so they direct
23
24
          us --
```

THE WITNESS: No, Ermak USA. 1 2 So, the Ermak in the USA is sending us to the customers. Not Ermaksan, Ermaksan (sic) 3 USA is sending us. 4 Yeah. So the Ermaksan (sic) USA is -- what 5 Q. is the relationship to Ermaksan Turkey, as 6 7 far as you know? It's a branch. It's a branch of Ermaksan. 8 Α. Have you ever -- have you ever gone to the 9 Q. United States in the course of your work? 10 Yes, I did. 11 Α. 12 Q. Have you ever gone to work in the State of Massachusetts? 13 Ermak -- Ermaksan USA send me to there, and Α. 14 then I came to Massachusetts. Ermaksan and 15 16 Ermaksan USA is different companies. THE WITNESS: Ermak USA, not 17 Ermaksan, Ermak USA. 18 Ermak USA is another company. 19 Α. But as far as your work, do you recall when 20 Ο. you were in Massachusetts from -- in the 21 course of your work? 22 THE INTERPRETER: Can you repeat 23 question again? 24

EXHIBIT L

Vol: I

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UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

-----x
IVAN LAGUNA and MARGARITA LOPEZ,
Plaintiffs,

VS.

C.A. NO. 3:23-CV-30016

LAZER SAFE, PTY, LTD, FIESSLER ELECTRONIK
GmbH & CO., KG., ERMAK USA, INC., ERMAKSAN
TURKEY, aka ERMAKSAN MAKINA SANAYI VE TICARET
A.S., and JOHN DOE DISTRIBUTOR,
Defendants.

-----x

ZOOM AUDIOVISUAL DEPOSITION OF

MICHAEL MENARD, a witness called on behalf of the Plaintiffs, taken pursuant to notice before Karen D. Quigley, Registered Merit Reporter and Notary Public in and for the Commonwealth of Massachusetts on Thursday, December 12, 2024, commencing at 10:03 a.m.

LONDON STENOGRAPHY LLC
P.O. BOX 155
Manomet, Massachusetts 02345
774.259.0646
londonreporter@comcast.net

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```
APPEARANCES:
 1
     (All parties present from their
     respective locations via
 2
     Zoom Videoconferencing.)
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     SULLIVAN & SULLIVAN, LLP
          By Michael J. Mascis, Esquire
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          83 Walnut Street
          Wellesley, Massachusetts 02481
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          781-263-9400
          mmascis@sullivanllp.com
 6
          For the Plaintiffs
 7
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          By Timothy M. Netkovick, Esquire
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          33 State Street
          Springfield, Massachusetts 01103
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          413-781-0560
          tnetkovick@baconwilson.com
10
          For the Deponent, Michael Menard
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     REED SMITH, LLP
          By Patricia E. Antezana, Esquire
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          225 Fifth Avenue, Suite 1200
          Pittsburgh, Pennsylvania 15222
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          412-288-7242
          pantezana@reedsmith.com
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          For the Defendant Fiessler Electronik GmbH
15
     ATOM LAW GROUP
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          By Sean M. Sharp, Esquire
          770 N LaSalle Street, Suite 700
          Chicago, Illinois 60654
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          312-943-8000
          ssharp@atom.law
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          For the Defendants Ermak USA and Ermaksan
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          Turkey
     LITCHFIELD CAVO LLP
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          By Nora R. Adukonis, Esquire
          1006 Kimball Lane
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          Lynnfield, Massachusetts 01940
          781-309-1500
22
          adukonis@litchfieldcavo.com
23
          For the Defendant Lazer Safe
24
     Videographer: Adam Cerro
```

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```
What do you mean by that? I don't
         Q.
 1
 2
     understand.
              It's -- I don't know anything about that
 3
         Α.
     stuff so I needed guidance.
 4
              So -- so someone called you on the phone
 5
     and walked you through every step of the
 6
     installation of the light guard?
 7
         Α.
              Yes, yes.
 8
              Did that include programming it in the
 9
         Ο.
     control panel?
10
         Α.
11
              No.
12
         Ο.
              Do you know how that was accomplished?
              I don't. I don't.
13
         Α.
              Was that -- any of this work done online
14
         Q.
     in addition to by telephone?
15
16
         Α.
              No.
              It was just -- just --
17
         Q.
              I don't recall anything like that, no.
18
         Α.
              Okay. Do you have any type of handheld
19
     device like an iPad or something that you use
20
     when you're doing the installation?
21
         Α.
              No, just my phone.
22
              Okay. Do you know how long it took you
23
         Ο.
     to do the light curtain installation?
24
```

```
I can't recall that.
         Α.
 1
 2
         Q.
              Did -- did anyone come out to inspect it
     after you completed it --
 3
              I don't --
 4
         Α.
              -- the installation?
 5
         Ο.
              I don't remember that either.
         Α.
 6
 7
         Ο.
              Okay. Was there any testing done, you
     know, that someone guided you on how to test the
 8
     quard once you had it installed?
 9
              Once it was installed, the person I was
10
     talking to on the phone had me start it up and
11
12
     go through all the sequences of getting it
     operational, running, and everything I remember
13
     worked fine.
14
              Okay. And do you remember approximately
15
16
     when that was in relation to this email that you
     did the installation?
17
         Α.
              I don't.
18
19
         Q.
              Okay. Did you -- did you take any
     pictures during the installation yourself?
2.0
              No, I didn't.
21
         Α.
              Did you make any records related to the
22
         Ο.
     install that you did for the light curtain?
23
24
         Α.
              No.
```